INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

GenCorp, Inc., dba GDX Automotive
One General Street
Wabash, Indiana 46992

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T169-5650-00004	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 15, 2002

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary rubber product manufacturing operation.

Responsible Official:	Michael Talaga, Plant Manager
Source Address:	One General Street, Wabash, IN 46992
Mailing Address:	One General Street, Wabash, IN 46992
Phone Number:	260-569-5255
SIC Code:	3069
County Location:	Wabash
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10);

(c) Extrusion Line 1, consisting of the following:

(1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;

(2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks L1-1 through L1-5; and

(3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.

(4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L1-6); and

(5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1 mmBtu per hour, constructed in 1999, exhausting to stack L1-8 & 9.

(d) Extrusion Line 2, consisting of the following:
  (1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
  (2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8);
  (3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (L2-9);
  (4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (L2-1 and 2)

(e) Extrusion Line 3, consisting of the following:
  (1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
  (2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents L3-1 through L3-5; and
  (3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.

(f) Extrusion Line 4, consisting of the following:
  (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
  (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
  (3) One (1) Line 4 spray booth, utilizing HVLP application method,exhausting to stack L4-6.

(g) Extrusion Line 5, constructed in 1989, consisting of:
  (1) One (1) Line 5 extruder with a total maximum capacity of 1000 pounds of extruded rubber per hour;
  (2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (L5-1 through L5-10); and
  (3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of two (2) extruders and one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2);

(i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

(j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;

(k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);

(l) Line 8 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L8-1;

(m) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;

(n) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft^2 of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);

(o) One (1) below belt coating operation consisting of:
(1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack BB-1, and
(2) Three (3) electric IR ovens exhausting to stack BB-2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;[326 IAC 6-3-2(c)] (covered under C.1)

(b) Other activities or categories not previously identified with a potential to emit less than significant levels:
(1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2(c)] (covered under C.1)
(2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2(c)] (covered under C.1)
(3) P207 Finishing area 239, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2(c)] (covered under C.1)
(4) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2(c)] (covered under C.1)
(5) Two (2) Barwell Extruders, exhausting inside the building;[326 IAC 6-3-2(c)] (covered under C.1) and
(6) Plug Presses and RCT Operations. [326 IAC 6-3-2(c)] (covered under C.1)

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ***,*** within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(a) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using four (4) baghouses (BH02, BH03, BH04, BH05) as particulate control and exhausting to four (4) stacks (BH02, BH03, BH04, BH05);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (BH06, BH07, BH08, BH10) as particulate control, exhausting to four (4) stacks (BH06, BH07, BH08, BH10);

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the rubber product manufacturing operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Banbury Mills	5.55	12.93
Compound Handling	15.00	25.16

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.3 Particulate Matter (PM)

The baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling for PM control shall be in operation at all times when the Banbury Mills and Compound handling are in operation.

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the Banbury Mills stacks (BH02, BH03, BH04, BH05) and Compound handling (BH06, BH07, BH08, BH10) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling at least once per shift when the Banbury Mills and Compound handling are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses ((BH02 - BH08 and BH10) is outside the normal range of 1 and 10 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags (identified as BH02 - BH08 and BH10) controlling the Banbury Mills and Compound handling operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.1.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the Banbury Mills, stacks (BH02, BH03, BH04, BH05) and Compound handling, stacks (BH06, BH07, BH08, BH10) exhaust once per shift.

(b) To document compliance with Condition D.1.5, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the inspections required under Condition D.1.6 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(c) Extrusion Line 1, consisting of the following:
- (1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;
- (2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks L1-1 through L1-5; and
- (3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack L1-7.
- (4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (L1-6); and
- (5) Two (2) high velocity hot air natural gas ovens, each with a maximum rated heat input of 1 mmBtu per hour, constructed in 1999, exhausting to stack L1-8 & 9.

(d) Extrusion Line 2, consisting of the following:
- (1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (L2-3 through L2-8);
- (3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (L2-9);
- (4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (L2-1 and 2)

(e) Extrusion Line 3, consisting of the following:
- (1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
- (2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents L3-1 through L3-5; and
- (3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent L3-6.

(f) Extrusion Line 4, consisting of the following:
- (1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
- (2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
- (3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

(g) Extrusion Line 5, constructed in 1989, consisting of:
- (1) One (1) Line 5 extruder with a total maximum capacity of 1000 pounds of extruded rubber per hour;
- (2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (L5-1 through L5-10); and
- (3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (L5-11).

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of two (2) extruders and one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (L6-1 and 2);

(i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

(j) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;
(k) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (FA-1);
(l) Line 8 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L8-1;
(m) Line 9 plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep and exhausting to stack L9-1;
(n) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft^2 of plastic products per hour, exhausting to three (3) stacks (L7-1 through L7-3);
(o) One (1) below belt coating operation consisting of:
    (1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack BB-1, and
    (2) Three (3) electric IR ovens exhausting to stack BB-2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

(a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:
    (1) Line 3 Extruders;
    (2) Line 4 Extruders;
    (3) Line 5 Extruder;
    (4) Line 6 Extruders;
    (5) HVLP Honda Coating Booth
    (6) Department 350 RCT brush application;
    (7) Line 4 topcoat spray booth;
    (8) U152 (below belt) Coating Booth;
    (9) Line 3 adhesive application booth;
    (10) Line 8 adhesive prep application booth; and
    (11) Line 9 adhesive prep application booth.

(b) Single HAP and total HAPs usages for each of the following HAPs emitting facilities:
    (1) Line 5 adhesive application booth; and
    (2) Line 7 adhesive application booth.

shall be limited, to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Line 1 On-Line topcoat spray booth, Line 2 On-Line HVLP spray booth, Line 4 topcoat spray booth, Finishing Area 239 HVLP coating operation and the U152 (below belt) Coating Booth shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) Any change or modification which may increase potential usage of VOC for each of the
(1) Banbury Mills and Mixers;
(2) Line 1 Extruders;
(3) Line 2 Extruders;
(4) Line 3 Extruders;
(5) Line 4 Extruders;
(6) Line 5 Extruder;
(7) Line 6 Extruders;
(8) HVLP Honda Coating Booth
(9) Department 350 RCT brush application;
(10) Line 4 topcoat spray booth;
(11) U152 (below belt) Coating Booth;
(12) Line 1 On-Line topcoat spray booth;
(13) Line 3 adhesive application booth;
(14) Line 8 adhesive prep application booth; and
(15) Line 9 adhesive prep application booth;

to greater than 25 tons per year, before add-on controls, shall require OAQ's prior approval before such change can take place.

(b) VOC usage shall be limited, to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply, in the following:
(1) Line 1 adhesive application booth;
(2) Line 2 booths (two(2) HVLP spray booths and one (1) adhesive booth);
(3) Line 5 adhesive application booth; and
(4) Line 7 adhesive application booth.

These usage limits will limit VOC emissions to less than 25 tons per year for each of the facilities listed above. Therefore, the requirements of 326 IAC 8-1-6 do not apply. The VOC usage limits shall also limit source wide VOC emissions to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.

(c) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the extruded rubber flocking for Line 5, HVLP coating operations (P207 Finishing Area 239 Primer Booth and insignificant P207 topcoat booths) and wipe /cleaning (Finishing Area 239) shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this faculty is:
(1) Drip and wipe method for extruded rubber flocking;
(2) Wipe method for extruded rubber wipe/cleaning; and
(3) HVLP application method for spray coating of primer and decorative topcoat.

D.2.4 Nonapplicable Construction Permit Requirements

The requirements from:

(a) Construction Permit (169-1993-00004), issued on September 6, 1991, Condition 4, listing requirements pursuant to 326 IAC 2-3;

(b) Construction Permit (169-4072-00004), issued on February 13, 1995, Condition 5, listing requirements pursuant to 326 IAC 2-3;

(c) Amendment (169-11456-00004), issued on November 4, 1999 and the new operation condition #5 of [CP 169-4072-00004], listing requirements pursuant to 326 IAC 2-2 and 40 CFR 52.21;

are not applicable because IDEM, OAQ has determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential to emit VOC from the source is less than 250 tons per year and is a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) and Hazard Air Pollutants (HAPs)

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.2.1 and D.2.3(a) and (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC and HAPs Emissions

Compliance with Conditions D.2.1 and D.2.3(a) and (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage at each facility for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation and control emissions from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152), at all times that the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the one (1) HVLP coating operation for Finishing Area 239, Extrusion Line 2 HVLP spray booths, one (1) Line 4 topcoat spray booth, one (1) HVLP coating operation for Finishing Area 239, and one (1) below belt spray coating booth, identified as U152), are in operation.

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 3 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152) stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.3(a) and (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Conditions D.2.1 and D.2.3(a) and (b).

(1) The amount and VOC and HAPs content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC, single HAP and total HAPs usages for each month; and

(5) The weight of VOCs, single HAP and total HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1(b) and D.2.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Gencorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Gencorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: GenCorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 5 adhesive application booth, and Line 7 adhesive application booth
Parameter: HAPs usage
Limit: Single HAP and total HAPs usages in the Line 5 and Line 7 adhesive booths, shall each be limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

YEAR: _____

Month	Facilities	HAPs Usages This Month		HAPs Usages Previous 11 Months		HAPs Usages 12 MonthsTotal	
		Single	Total	Single	Total	Single	Total
Month 1	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 2	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 3	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Gencorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 1 adhesive application booth, Line 2 booths (spray and adhesive), Line 5 adhesive application booth, and Line 7 adhesive application booth
Parameter: VOC usages
Limit: VOC usages in the Line 1 adhesive application booth, the Line 2 booths (spray and adhesive), the Line 5 adhesive application booth, and the Line 7 adhesive application booth, shall each be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Facilities	VOC Usages This Month	VOC Usages Previous 11 Months	VOC Usages 12 Month Total
Month 1	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
Month 2	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
Month 3	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Gencorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	GenCorp, Inc. dba GDX Automotive
Source Location:	One General Street, Wabash, Indiana 46992
County:	Wabash
SIC Code:	3069, 3089
Part 70 Operating Permit No.:	T169-5650-00004
Permit Reviewer:	Phillip Ritz/EVP

On December 20, 2000, the Office of Air Quality (OAQ) had a notice published in the Wabash Plain Dealer, Wabash, Indiana, stating that GenCorp, Inc. dba GDX Automotive had applied for a Part 70 Operating Permit to operate a rubber product manufacturing operation with control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On January 18, 2001 and October 5, 2001, GenCorp, Inc. dba GDX Automotive submitted comments on the proposed Part 70 Operating Permit. The summary of the comments and corresponding responses is as follows:

Comment 1
As of January 3, 2001, Gencorp, Inc. has changed its name to GenCorp, Inc. dba GDX Automotive. Please change the company name throughout the entire permit.

Response 1
The references to the source name throughout the permit have been changed from Gencorp, Inc., to GenCorp, Inc. dba GDX Automotive.

Comment 2
The responsible official listed in Section A.1 should now be Michael Talaga, Plant Manager, not John Keely. Telephone area code for the plant has recently been changed from 219 to 260.

Response 2
The responsible official listed in Section A.1 has been changed to Michael Talaga, Plant Manager and the telephone area code has been changed from 219 to 260.

Comment 3
GDX Automotive has renumbered the baghouse and stack identities. The new identifications are listed below. Please change throughout the permit as necessary.

(a)	Banbury Mills and Mixers baghouses	BH02, BH03, BH04, BH05
(b)	Banbury Mills and Mixers vents	BH02, BH03, BH04, BH05
(c)	Compound handling baghouses	BH06, BH07, BH08, BH10
(d)	Compound handling vents	BH06, BH07, BH08, BH10
(e)	Line 1 curing oven,	L1-1 through 5
(f)	Line 1 flock adhesive application booth,	L1-7
(g)	Line 1 On-Line topcoat booth,	L1-6
(h)	Line 1 ovens,	L1-8 & 9
(i)	Line 2 oven,	L2-3 through 8
(j)	Line 2 adhesive application booth,	L2-9
(k)	Line 2 HVLP spray booths,	L2-1 & 2
(l)	Line 3 natural gas fired hot air ovens,	L3-1 through 5
(m)	Line 3 adhesive application booth,	L3-6
(n)	Line 3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.	L3-7
(o)	Line 5 curing oven	L5-1 through 10
(p)	Line 5 adhesive application booth,	L5-11
(q)	HVLP coating operation for Finishing Area 239,	FA-1
(r)	Extrusion Line 6, oven	L6-1 & 2
(t)	Line 8	L8-1
(u)	Line 9	L9-1
(v)	Line 7	L7-1 through 3
(w)	below belt spray coating booth	BB-1
(x)	below belt ovens	BB-2

Also, as a result of Second Minor Source Modification No. 169-14411-00004, issued on June 14, 2001, the following changes should be made to Sections A.2 and D.2 and any associated terms and conditions should be incorporated into Section D.2:

! A.2(e)(4) can be deleted because the Line 3 topcoat booth is not operational. The permit for the Line 3 topcoat booth has been transferred to Line 4.

! A new sub-letter can be added to describe a new extrusion line as follows:

Extrusion Line 4, consisting of the following:

(1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;
(2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and
(3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

! A new sub-letter can be added to describe a new coating booth as follows:

One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2.

Response 3
The emission unit descriptions in Section A.2, D.1, D.2 and D.3 have been revised as follows to incorporate the updated information (additions indicated in **boldface**, deletions indicated by ~~strikeout~~ for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using ~~six (6)~~ **four (4)** baghouses (~~CE02, CE03, CE04, CE05, CE06~~ **BH02, BH03, BH04, BH05**) as particulate control and exhausting to ~~six (6)~~ **four (4)** stacks (~~R-23, R-24, R-25, R-26, R-34 and R-38~~ **BH02, BH03, BH04, BH05**);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (~~CE07, CE08, CE09, CE10~~ **BH06, BH07, BH08, BH10**) as particulate control, exhausting to four (4) stacks (~~R-15, R-36, R-37 and R-40~~ **BH06, BH07, BH08, BH10**);

(c) Extrusion Line 1, consisting of the following:

(1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;
(2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks ~~F2-15, F2-21, F2-28, and F2-33~~ **L1-1 through L1-5**; and
(3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack ~~F3-1~~ **L1-7**.
(4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (~~F2-41~~ **L1-6**); and
(5) Two (2) ~~electric IR~~ **high velocity hot air natural gas ovens, each with a maximum rated heat input of 1 mmBtu per hour,** constructed in ~~1997~~**1999, exhausting to stacks L1-8 & 9**.

(d) Extrusion Line 2, consisting of the following:
(1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
(2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (~~F2-14, F2-20, F2-30, F2-31, F2-38 and F2-42~~ **L2-3 through L2-8**);
(3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (~~F-3-2~~ **L2-9**);
(4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (~~F2-10 and F2-13~~ **L2-1 and 2**)

(e) Extrusion Line 3, consisting of the following:
(1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;

(2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents ~~F2-50 through F2-54~~ **L3-1 through L3-5; and**

(3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent ~~F2-55~~ **L3-6.**~~; and~~

~~(4) One (1) Line 3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.~~

(f) Extrusion Line 4, consisting of the following:

(1) Two (2) extruders, with a combined maximum capacity of 1000 pounds of rubber per hour;

(2) One (1) electric molten salt curing oven exhausting to five (5) stacks (L4-1 through L4-5); and

(3) One (1) Line 4 spray booth, utilizing HVLP application method, exhausting to stack L4-6.

(~~f~~**g**) Extrusion Line 5, constructed in 1989, consisting of:

(1) ~~Two (2)~~**One (1)** Line 5 extruder~~s~~ with a total maximum capacity of 1000 pounds of extruded rubber per hour;

(2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (~~F2-22, F2-23, F2-29, F2-32, F2-36, F2-43, F2-44, F3-3, and F3-6~~ **L5-1 through L5-10**); and

(3) One (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (~~F3-15~~ **L5-11**).

(~~g~~**h**) Extrusion Line 6, constructed in 1978 and 1985, consisting of two (2) extruders and one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (~~F2-16 and F2-24~~ **L6-1 and 2**);

(i) One (1) HVLP surface coating booth, identified as Honda Coating Booth, coating rubber parts at a maximum rate of 94 parts per hour, with particulate emissions controlled by a dry filter system and emissions exhausted through stack H-1, and equipped with one (1) electric IR drying oven, identified as Honda IR oven, with emissions exhaust through stack H-2;

(~~h~~**j**) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building;

(~~i~~**k**) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (~~S-24~~ **FA-1**);

(~~j~~**l**) Line 8 plastic parts adhesive **prep** application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive **prep** and exhausting to stack ~~F2-48~~ **L8-1**;

(~~k~~**m**) Line 9 plastic parts adhesive **prep** application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive **prep** and exhausting to stack ~~F2-49~~ **L9-1**;

(~~l~~**n**) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft^2 of plastic products per hour, exhausting to three (3) stacks (~~F2-45, F2-46 and F2-47~~ **L7-1 through L7-3**);

(~~m~~**o**) One (1) below belt coating operation consisting of:
(1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack ~~SV F3-12~~ **BB-1**, and
(2) Three (3) electric IR ovens exhausting to stack ~~SV F3-13~~**BB-2**.

The operating conditions in Section D.2 have been revised to incorporate the addition of the Line 4 Extruders and the Honda Coating Booth, in accordance with the Second Minor Source Modification 169-14411-00004, issued on June 14, 2001. The changes to the operation conditions in Section D.2 are covered under the responses to comments 16 and 17.

Comment 4
Condition A.2(f)(1) describes two extruders for Line 5. Line 5 only employs one extruder but the maximum capacity is still the same. Please change the Line 5 description to "one (1) Line 5 extruder" throughout the entire permit.

Response 4
The emission unit description has been revised. The changes have been shown in the response to comment 2.

Comment 5
Conditions A.2(j) and (k) describe Lines 8 & 9 plastic parts adhesive application stations. These units would be better described as a "plastic parts adhesive prep application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive prep." Please include this description throughout the entire permit as applicable.

Response 5
The emission unit description has been revised. The changes have been shown in the response to comment 2.

Comment 6
Condition A.3 of the permit describes all of the insignificant activities currently located at the plant that have specifically regulated activities. All of these activities are also described in Section D.3 with the applicable requirement of 325 IAC 6-3-2 for process operations with a maximum process weight rate of greater than 100 lb/hr and less than 60,000 pounds per hour. However, the maximum process weight rates for each of the insignificant activities described in this section are 100 lb/hr or less. Therefore, the general requirement of Condition C.1 applies to these emission units. For this reason, Condition A.3 and Section D.3 should be deleted. For Item (b)(3), it is clearer to state "P207 Finishing Area 239...". Additionally, note that A.3(b) and D.3(b) describe an activity (Trimmers) that is not at the plant.

Response 6
The trimmer description in Section A.3(b) has been removed as there are no trimmers located at this plant. All activities listed under Section A.3 have a process weight rate of less than 100 pounds per hour and are subject to the requirements of 326 IAC 6-3-2(c) and such rule has been covered under Condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour). Since particulate matter emissions for all these activities are regulated by Condition C.1, it is not necessary to repeat the requirements in Section D.3. Therefore, the entire Section D.3 has been removed. Also, all the rule cites in Section A.3 have been revised, to specify that these activities are subject to 326 IAC 6-3-2(c), as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2**(c)**] **(covered under C.1)**

~~(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2]~~

(~~c~~**b**) Other activities or categories no**t** previously identified with a potential to emit less than significant levels:

(1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2**(c)**] **(covered under C.1)**

(2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2**(c)**] **(covered under C.1)**

(3) P207 Finishing area **239**, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2**(c)**] **(covered under C.1)**

(4) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2**(c)**] **(covered under C.1)**

(5) Two (2) Barwell Extruders, exhausting inside the building;[326 IAC 6-3-2**(c)**] **(covered under C.1)** and

(6) Plug Presses and RCT Operations. **[326 IAC 6-3-2(c)] (covered under C.1)**

Comment 7

GDX Automotive requests that Condition B.15 include a statement that specifies that it is not a deviation if compliance monitoring requirements are not followed in inclement weather or when any other unsafe conditions are prevalent. For example, if the plant is snow-covered or the roof is icy, it may not be appropriate to perform rooftop monitoring. Accordingly, we would propose the following addition to Condition B.15(b):

(b) exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(3) Failure to conduct compliance monitoring requirements where conditions, such as bad weather, would cause the compliance monitoring to be unsafe, impractical, or not likely to generate any useful data.

Response 7

Access to the roof is not always necessary to record visible emissions. An observer does not have to be able to see the stack. They are required to look at the exhaust coming from the stack. If the observer stood far enough away from the building, then they should be able to see the emissions from the ground. Access to the rooftop is required when conducting monthly rooftop inspections. The rooftop inspector can choose a time when access is safe to perform monthly rooftop inspections. There has been no change to the permit as a result of this comment.

Comment 8
Condition C.15 contains requirements for a Compliance Monitoring Plan. We do not believe that 326 IAC 2-7-5 or 326 IAC 2-7-6 authorizes IDEM to require the preparation of a Compliance Response Plan. Additionally, failure to take specific response steps in accordance with such a Plan should not itself be evidence of non-compliance with an applicable requirement. Please delete this condition.

Comment 9
Conditions D.1.2 and D.2.5 require development of a Preventive Maintenance Plan for the facility and any control devices. Preventive Maintenance Plans are only required for control equipment to prevent control equipment malfunctions. Not only is this the law, but it also makes practical sense in the context of the permit where the permitted facilities cannot be “maintained” in a manner to reduce emissions. Instead, for this plant, it is the effectiveness of the control equipment that determines emission rates. Please modify this requirement by stating that a Preventive Maintenance Plan is required “for any control devices” and by deleting references to “facility” from this requirement.

Responses 8 and 9
IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee’s ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled “Preventive Maintenance Plan.” Under that section the permittee’s Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an “out of specification situation,” and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee’s equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be include in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5. There has been no change to the permit as a result of this comment.

Comment 10
GDX Automotive requests that Condition D.1.4 be removed from the permit. The only plausible basis for requiring visible emissions notations is to determine particulate matter emissions. According to the proposed technical support document, the actual particulate matter emissions for the entire plant are approximately 0.5 tons per year. Particulate matter emissions from these operations are so low that visible emission notations on these stacks are unwarranted.

Response 10
The basis for determining that the actual particulate matter emissions of the entire plant to be approximately 0.5 tons per year is proper operation of particulate matter control devices. The potential uncontrolled particulate matter emissions are greater than 88 tons per year. 326 IAC 2-7-5(3) requires that permits contain conditions to ensure that all reasonable data is provided to evaluate continuous compliance. Since the emissions could be significant if the control equipment is not operating properly, the IDEM believes it is reasonable to visually observe stack emissions periodically. There has been no change to the permit as a result of this comment.

Comment 11
Condition D.1.5 includes a requirement for pressure drop monitoring once per shift. While GDX Automotive understands that some monitoring is necessary in conjunction with a Compliance Response Plan, once per shift monitoring seems excessive. Please reduce the monitoring frequency to once per day. Further, GDX Automotive requests that the calibration requirements in this section be changed from once every six months to once per year.

Response 11
To evaluate continuous compliance, IDEM generally required that parametric monitoring be performed once per shift for these type of operations and the instrument used for determining the pressure be calibrated once every six months. No change has been made to the permit as a result of this comment.

Comment 12
GDX Automotive requests that Condition D.1.7 be deleted. This requirement is redundant to D.1.3 which requires that the baghouses be used when the Banbury Mills and the compound handling are in operation.

Response 12
These requirements are not redundant, as torn or otherwise failed bags can have a dramatic effect on baghouse performance and few sources have reliable information that demonstrates that compliance can be achieved when compartments are “on line” with torn bags. Pursuant to 326 IAC 2-7-5(1)(F), each Part 70 permit is required to contain conditions which minimize excess emissions to the extent feasible, caused by events such as a bag failure. The requirements shall take into consideration available technologies, safety cost, and other relevant factors. No change has been made to the permit as a result of this comment.

Comment 13
D.1.8(a) should be deleted because we’ve requested that Condition D.1.4 be deleted.

Response 13
See the response to comment 10. No change has been made to the permit as a result of this comment.

Comment 14
D.1.8(b)(1) should describe quarterly records to be consistent with our request for Condition D.1.5. Further, D.1.8(b)(1)(B) should be deleted or further explained.

Response 14
As mentioned in Response 11, IDEM generally requires the parametric monitoring be performed once per shift for these type of operations. The cleaning cycle operation provisions of Condition D.1.8(b)(1)(B) are for the cleaning of the pressure taps and are required to prevent premature pressure sensing instrument failure due to clogging. The intent of the condition is to ensure proper operation of the control device such that compliance with the PM emission limit is maintained. The OAQ has decided that records of differential pressure and the cleaning cycle are both important factors in assessing whether the baghouses are operating properly. A brief assessment of the cleaning cycle can be made in conjunction with the weekly check of pressure drops. No change has been made to the permit as a result of this comment.

Comment 15
Please correct the descriptions in Section D.2 to be consistent with our requests for description changes in Section A. Further, since there are requirements for the Banbury Mills and Compound Handling in Section D.2, these emission units should also be described under the Facility Description.

Response 15
Section D.2 has been revised to remove the references to the Banbury Mills and Compound Handling, which are already listed under Section D.1. Conditions D.2.1 and D.2.3 have been revised and the changes are listed under the response to comments 16 and 17.

Comment 16
Condition D.2.1 lists the emission units in the permit that currently do not have potential HAP emissions greater than 10 TPY for a single HAP or 25 TPY for total HAPs.

The Barwell Extruders are listed in the technical support document (TSD) as insignificant activities but are also listed in this section. They should be deleted from Condition D.2.1 since they are insignificant. Also notice that the correct spelling is Barwell instead of Banwell.

Additionally, this section should also include Line 1 Extruders, Line 1 Topcoat Booth, Line 2 Spray Booths, Line 2 Adhesive Application Booth, Line 3 Extruders, Line 3 Coating booth, Line 4 Extruders, the Honda Coating Booth and Off-Line Finish Area 239 Coating Booth.

Response 16

The Barwell Extruders have been deleted from Condition D.2.1. The Line 3 coating booth has been changed to Line 4 coating booth. The Line 3 Extruders have been added to D.2.1. The Line 4 Extruders and the Honda Coating Booth have been included in Condition D.2.1, as approved in the Second Minor Source Modification 169-14411-00004, issued on June 14, 2001. Additionally, based on the updated emission calculations, the Line 1 adhesive application booth, the Line 2 coating and adhesive application booths, the Line 5 adhesive application booth, Line 7 adhesive application booth, and coating operation for Finishing Area 239, each has potential single HAP and total HAPs emissions of greater than 10 and 25 tons per year, respectively. However, Line 1, Line 2 and Finishing Area 239 were constructed prior to the 326 IAC 2-4.1-1 applicability date of July 27, 1997. Therefore, to render 326 IAC 2-4.1-1 not applicable, single HAP and total HAPs emissions from the Line 5 adhesive application booth and the Line 7 adhesive application booth must be limited to less than 10 and 25 tons per 12 consecutive month period, respectively. The following changes have been made to D.2.1 to include emission units that may become subject to New Source Toxics Control:

D.2.1 New Source Toxics Control [326 IAC 2-4.1-1]

(a) Any change or modification which may increase actual usage of any single HAP and any combination of HAPs, to greater than 10 and 25 tons per year, respectively, before add-on controls, shall require OAQ's prior approval before such change can take place, for each of the:

~~(a) Banbury Mills and Mixers;~~
~~(b) Banwell Extruders;~~
~~(c) Line 2 Extruders;~~
(1) Line 3 Extruders;
(2) Line 4 Extruders;
~~(d)~~**(3)** Line 5 Extruder~~s~~;
~~(e)~~**(4)** Line 6 Extruders;
(5) HVLP Honda Coating Booth
~~(f)~~**(6)** Department 350 RCT brush application;
~~(g)~~**(7)** Line ~~3~~**4** topcoat spray booth;
~~(h)~~**(8)** U152 (below belt) Coating Booth;
~~(i)~~**(9)** Line 3 adhesive application booth;
~~(k) Line 5 adhesive application booth;~~
~~(l) Line 7 adhesive application booth;~~
~~(m)~~**(10)** Line 8 adhesive **prep** application booth; and
~~(n)~~**(11)** Line 9 adhesive **prep** application booth.

(b) Single HAP and total HAPs usages for each of the following HAPs emitting facilities:

(1) Line 5 adhesive application booth; and
(2) Line 7 adhesive application booth.

shall be limited, to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

Conditions D.2.6, D.2.7, D.2.11, and D.2.12 were also revised to reflect the changes made to Condition D.2.1. Changes made to D.2.11 (now renumbered as D.2.10) are included in the response to comment 17, and changes made to Conditions D.2.6, D.2.7, and D.2.12 (now renumbered as D.2.11) are as follows:

D.2.6 Volatile Organic Compounds (VOC) **and Hazard Air Pollutants (HAPs)**

Compliance with the VOC **and HAP** content and usage limitations contained in Condition**s D.2.1 and** D.2.3**(a) and** (b) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC **and HAPs** Emissions

Compliance with Condition**s D.2.1 and** D.2.3**(a) and** (b) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage at each facility for the most recent twelve (12) month period.

D.2.1~~2~~**1** Reporting Requirements

A quarterly summary of the information to document compliance with Condition**s D.2.1(b) and** D.2.3(b) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

A quarterly reporting form to show compliance with the requirements of Condition D.2.1(b) has been added to the Title V permit as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: GenCorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 5 adhesive application booth, and Line 7 adhesive application booth
Parameter: HAPs usage
Limit: Single HAP and total HAPs usages in the Line 5 and Line 7 adhesive booths, shall each be limited to less than 10 and 25 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively, so that the requirements of 326 IAC 2-4.1-1 do not apply.

YEAR: _____

Month	Facilities	HAPs Usages This Month		HAPs Usages Previous 11 Months		HAPs Usages 12 MonthsTotal	
		Single	Total	Single	Total	Single	Total
Month 1	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 2	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						
Month 3	Line 5 Adh. App. Booth						
	Line 7 Adh. App. Booth						

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 17

D.2.3(a) should contain Line 2 Extruders. Also, the Line 7 adhesive application booth should be listed in D.2.3(b) instead of (a) because potential emissions were incorrectly calculated in Appendix A.

Response 17

TSD Appendix A has been revised and the new emissions and emission summary is included at the end of this Addendum. The Line 2 Extruders and the Line 1 topcoat spray booth have been added to Condition D.2.3(a). Pursuant to the Second Minor Source Modification 169-14411-00004, issued on June 14, 2001, the Line 4 Extruders and the Honda Coating Booth have also been added to the facilities listed under D.2.3(a). Based on the updated emission calculations, the Line 1 adhesive application booth, the Line 2 coating and adhesive application booths, the Line 5 adhesive application booth, and the Line 7 adhesive application booth, each has potential VOC emissions of greater than 25 tons per year and all these facilities have been included in D.2.3 (b), except for the Line 5 adhesive application booth which must be in compliance with D.2.3(c). However, the source wants to make sure the source wide potential to emit VOC be limited to less than 250 tons per year (see revised emissions summary spreadsheet on page 26 of this TSD Addendum) to render the requirements of 326 IAC 2-2 not applicable the source is willing to limit VOC emissions from Line 5 adhesive application booth to less than 25 tons per 12 consecutive month period. The changes to Conditions D.2.3 (a), (b) are as follows:

D.2.3 General Volatile Organic Compound Reduction Requirements [326 IAC 8-1-6]

(a) Any change or modification which may increase potential usage of VOC for each of the
(1) Banbury Mills and Mixers;
(2) Line 1 Extruders;
(3) Line 2 Extruders;
~~(3)~~**(4)** Line 3 Extruders;
(5) Line 4 Extruders;
~~(4)~~**(6)** Line 5 Extruder~~s~~;
~~(5)~~ **(7)** Line 6 Extruders;
(8) HVLP Honda Coating Booth
~~(6)~~ **(9)** Department 350 RCT brush application;
~~(7)~~ **(10)** Line ~~3~~**4** topcoat spray booth;
~~(8)~~ **(11)** U152 (below belt) Coating Booth;
(12) Line 1 On-Line topcoat spray booth;
~~(9) Line 2 adhesive application booth;~~
~~(10)~~**(13)** Line 3 adhesive application booth;
~~(11) Line 7 adhesive application booth;~~
~~(12)~~**(14)** Line 8 adhesive **prep** application booth; and
~~(13)~~**(15)** Line 9 adhesive **prep** application booth.

to greater than 25 tons per year, before add-on controls, shall require OAQ's prior approval before such change can take place.

(b) VOC usage shall be limited, to less than 25 tons per twelve (12) consecutive month period, rolled on a monthly basis so that the requirements of 326 IAC 8-1-6 do not apply, in the following:
~~(1) Line 1 On-Line topcoat spray booth;~~
~~(2) Line 2 On-Line HVLP spray booth; and~~
~~(3)~~ **(1)** Line 1 adhesive application booth;
(2) Line 2 booths (two(2) HVLP spray booths and one (1) adhesive booth);
(3) Line 5 adhesive application booth; and
(4) Line 7 adhesive application booth.

These usage limits ~~with~~ **will** limit VOC emissions to less than 25 tons per year for **each of** the facilities listed above. Therefore, the requirements of 326 IAC 8-1-6 do not apply. **The VOC usage limits shall also limit source wide VOC emissions to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 do not apply.**

(c) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the extruded rubber flocking for Line 5, HVLP coating operations (Finishing Area 239 Primer Booth and insignificant P207 topcoat booths) and wipe /cleaning (Finishing Area 239) shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this faculty is:
(1) Drip and wipe method for extruded rubber flocking;
(2) Wipe method for extruded rubber wipe/cleaning; and
(3) HVLP application method for spray coating of primer and decorative topcoat.

The quarterly reporting form to document compliance with Condition D.2.3(b) has been revised as shown in the response to comment 22.

Comment 18
Condition D.2.4 states that certain requirements are not applicable because ".....based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential uncontrolled VOC emissions from the source never exceeded 250 tons per year and has always been a PSD minor source." This is not true, as the plant was a true PSD major source at the times that the referenced permits were issued and that is why the permits contained the limits that they did. However, in recent years, the combination of new USEPA approved AP-42 emission factors and the shut-down of several operations at the plant has changed the source status to a PSD minor source. Also, the revised emissions calculations show that unlimited emissions for the Line 7 adhesive application are higher than 25, 10 and 25 tons per year limits for VOC, single HAP and total HAPs, respectively. For this reason Condition 10 of construction 169-9774-00004 should still be applicable. Condition D.2.4(d) should be removed the from the Title V permit.

Response 18
At the time the three (3) approvals (CP169-1993-00004, issued on September 6, 1991; CP169-4072-00004, issued on February 13, 1995; and Amendment 169-11456-00004, issued on November 4, 1999) were issued, the source was designated as a PSD major source, using the USEPA approved emission factors used for the existing equipment at the source. Based on OAQ's emission calculations on the equipment currently existing at the source, the source has a potential to emit VOC emissions of less than 250 tons per year using the most recent USEPA approved emission factors. Therefore, the source has become a PSD minor source. The statements in Condition D.2.4 have been revised and Condition D.2.4(d) has been removed as follows:

D.2.4 Nonapplicable Construction Permit Requirements

The requirements from:

(a) Construction Permit (169-1993-00004), issued on September 6, 1991, Condition 4, listing requirements pursuant to 326 IAC 2-3;

(b) Construction Permit (169-4072-00004), issued on February 13, 1995, Condition 5, listing requirements pursuant to 326 IAC 2-3;

(c) Amendment (169-11456-00004), issued on November 4, 1999, and the new operation condition #5 of [CP 169-4072-00004], listing requirements pursuant to 326 IAC 2-2 and 40 CFR 52.21;

are not applicable because IDEM, OAQ has determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential ~~uncontrolled~~ **to emit** VOC ~~emissions~~ from the source ~~never exceeded~~ **is less than** 250 tons per year and ~~has always been~~ **is** a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

~~(d) Construction Permit 169-9774-00004, issued on August 18, 1998, Condition: 10 BACT Synthetic Minor Limitation and Condition: 11 MACT Synthetic Minor Limitation are not applicable since the emission unit permitted in this approval have since been identified as Line 7 adhesive application station, and based on the latest emission calculations for this emission unit, the PTE of VOC, any single and total HAPs are less than less than 25, 10 and 25 tons per year, respectively.~~

Comment 19
Condition D.2.9 requires daily visible emission notations of the spray coating operations. Please remove this condition because there are never visible emissions from these coating booth stacks. Daily inspections of the filter placement will be performed as required in D.2.10 and this will verify that overspray will not enter the stack. The pollutants of concern with the spray coating operations are VOC and HAPs, and the concentrations of these pollutants cannot be detected by visible emission notations.

Comment 20
Please delete Condition D.2.10 (b) because again, VOC and HAP emissions cannot be detected by a visual inspection of the stack. Additionally, overspray will not be present on the rooftop or nearby ground as long as the dry filters are utilized and again, the filters will be checked daily as required in D.2.10(a). The requirement to check overspray at the emission unit should also be deleted. The overspray observations would not serve a purpose because as long as the filters are in place, there will not be any visible particulate matter emissions to the atmosphere.

Responses 19 and 20
A control device is utilized on the covered spray booths to assure compliance with 326 IAC 6-3-2 and the allowable emissions from each emission unit for the controlled pollutant exceed 25 tons per year, therefore, inspections of dry filters and overspray are required for compliance monitoring. Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assure compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. The OAQ believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. In addition, evidence of deposition on the rooftops or the ground strongly implies increased particulate matter emissions into the air. Therefore, weekly overspray observations and monthly inspections on the rooftops and the nearby ground are required. However, OAQ has determined that Condition D.2.9 (Visible Emissions Notations) is not necessary, since the compliance monitoring requirements are covered by Condition D.2.10 (now renumbered as D.2.9) (Monitoring). Therefore, Condition D.2.9 has been removed.

Comment 21
Condition D.2.11(a) indicates that record keeping is required to document compliance with Condition D.2.3(b). Please change the last sentence of Condition D.2.11(a) to say “Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3(b)” for clarity. Does it mean that record keeping to document compliance with Conditions D.2.1 and D.2.3(a) is not required? Also please change D.2.11(a)(1) to say “The amount and VOC content of each coating material and solvent used. Records shall include those necessary to verify the type and amount used.“ Delete the overly-prescriptive references to “purchase orders, invoices, and material safety data sheets.”

Response 21
The source is required to limit the VOC and HAPs contents of cleaning solvents and coating as applied, as described in Conditions D.2.1 and D.2.3. OAQ determined that it is necessary to keep the records as described in Section D.2.11 (the purchase orders, invoices, and material safety data sheets) for the source to show compliance with Conditions D.2.1 and D.2.3. OAQ has determined that record keeping is required to document compliance not only with Condition D.2.3(b), but also with Conditions D.2.1, D.2.3(a) and D.2.10 (now renumbered as D.2.9, Monitoring). Condition D.2.11 (now renumbered as D.2.10) has thus been revised as follows:

D.2.11~~0~~ Record Keeping Requirements

(a) To document compliance with Condition**s D.2.1 and** D.2.3**(a) and** (b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC **and HAPs** usage limits and/or the VOC **and HAPs** emission limits established in Condition**s D.2.1 and** D.2.3**(a) and** (b).

(1) The amount and VOC **and HAPs** content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC**, single HAP and total HAPs** usage**s** for each month; and

(5) The weight of VOCs**, single HAP and total HAPs** emitted for each compliance period.

(b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(~~b~~**c**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 22
The draft Title V permit includes a quarterly report template for the Line 2 spray booth which does not have reporting requirement. The draft Title V permit does not have a quarterly report template for the Line 7 adhesive application booth which requires reporting.

Response 22
Based on the updated emission calculations the potential unlimited VOC emissions from each of the following facilities are greater than 25 tons per year, and VOC emissions from each facility are limited to less than 25 tons per twelve consecutive month period to render 326 IAC 8-1-6 not applicable:

(1) Line 1 adhesive application booth;
(2) Line 2 booths (two (2) HVLP spray booths and one (1) adhesive booth);
(3) Line 5 adhesive application booth; and
(4) Line 7 adhesive application booth.

VOC usage reporting forms for the Line 1 adhesive application booth and the Line 2 spray booth in the draft Title V permit have been removed and were replaced with the following consolidated reporting form:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Gencorp, Inc. dba GDX Automotive
Source Address: One General Street, Wabash, Indiana 46992
Mailing Address: One General Street, Wabash, Indiana 46992
Part 70 Permit No.: T169-5650-00004
Facility: Line 1 adhesive application booth, Line 2 booths (spray and adhesive), Line 5 adhesive application booth, and Line 7 adhesive application booth
Parameter: VOC usages
Limit: VOC usages in the Line 1 adhesive application booth, the Line 2 booths (spray and adhesive), the Line 5 adhesive application booth, and the Line 7 adhesive application booth, shall each be limited to less than 25 tons per twelve (12) consecutive month period.

YEAR: _____

Month	Facilities	VOC Usages This Month	VOC Usages Previous 11 Months	VOC Usages 12 Month Total
Month 1	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
Month 2	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			
Month 3	Line 1 Adh. App. Booth			
	Line 2 Booths (Spray & Adh.)			
	Line 5 Adh. App. Booth			
	Line 7 Adh. App. Booth			

9 **No deviation occurred in this quarter.**

9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Comment 23

Page 3 of 16 of the TSD lists insignificant activities. We have the following comments to the insignificant activities' descriptions:

(j) should say "Other activities or categories not previously . . . "
(j)(6) change description to "Development Area"
(j)(7) delete this and instead add "Department 207 control lab"
(j)(9) change description to "Five (5) Portable Inking Stations for Area 235 and Three (3) Portable inking Stations for Department 360"
(j)(17) Delete
(j)(20) Change description to "Plug Presses and RCT Operations"

Response 23

The following revisions have been made to the TSD (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support materials that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

(j) Other activities or categories no**t** previously identified with a potential to emit less than significant levels:
(1) Line 7 plastic extruders, flock system, and IR ovens:
(2) Line 8 plastic extruders
(3) Line 9 plastic extruders;
(4) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses;
(5) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel;
(6) ~~Prototype Laboratory for research and development~~ **Development Area**;
(7) ~~Constant temperature laboratory for research and development~~ **Department 207 control lab**;
(8) Mill laboratory for research and development;
(9) ~~Research and new product development (Area 571)~~**Five (5) Portable inking Stations for Area 235 and Three (3) Portable Inking stations for Department 360**;
(10) Development and Engineering center for research and development;
(11) P207 Finishing area, consisting of two (2) topcoat spray booths;
(12) Maintenance area 220 enclosed abrasive blast;
~~(13) Three (3) Portable Inking Stations for Area 235 and Three (3) Portable Inking Stations for Department 360;~~
~~(14)~~**(13)** Area 235 internal vacuum bags for flock material;
~~(15)~~**(14)** Area 207 Small quantity weigh station bag baler;
~~(16)~~**(15)** Area 207 Hy-Vac cleanup;
~~(17) Area 207 Littleford day mixer;~~
~~(18)~~**(16)** Area 207 12,000 gallon rubber mixing oil tanks (5);
~~(19)~~**(17)** Two (2) Barwell Extruders, exhausting inside the building; and
~~(20)~~**(18)** ~~One (1)~~ Plug Press**es** and RCT ~~application~~**Operations**, ~~constructed in 1987, with a maximum capacity of 100 pounds per hour, exhausting to one (1) stack (S-18)~~.

Section A.3 of the permit, Specifically Regulated Insignificant Activities, and the emission unit description in Section D.3 have also been revised as follows:

(a) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations; [326 IAC 6-3-2**(c)**]

~~(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone; [326 IAC 6-3-2]~~

(~~c~~**b**) Other activities or categories no previously identified with a potential to emit less than significant levels:

(1) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses; [326 IAC 6-3-2**(c)**]

(2) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel; [326 IAC 6-3-2**(c)**]

(3) P207 Finishing area, consisting of two (2) topcoat spray booths; [326 IAC 6-3-2**(c)**]

(4) Maintenance area 220 enclosed abrasive blast; [326 IAC 6-3-2**(c)**]

~~(5) Area 207 Littleford day mixer;[326 IAC 6-3-2]~~

~~(6)~~**(5)** Two (2) Barwell Extruders, exhausting inside the building;[326 IAC 6-3-2**(c)**] and

~~(7)~~**(6)** ~~One (1)~~ Plug Press**es** and RCT ~~application~~**Operations**, ~~constructed in 1987, with a maximum capacity of 100 pounds per hour, exhausting to one (1) stack (S-18)~~.. **[326 IAC 6-3-2(c)]**

Comment 24

Page 7 of 16 of the TSD, Actual Emission Section, provides tables of the actual emissions from the plant. The table heading are for Potential to Emit and should be changed to Actual Emissions. Further, single HAP emissions are shown to be less than 10 tpy for any single HAP. Per our 1999 reporting year emission statement, Xylene (a single HAP) was emitted in a quantity greater than 10 tpy. Also, the table should say “Total HAPs” instead of ”Total”.

Response 24

The following table shows the actual emissions from the source for 1999, using the new USEPA approved AP-42 emission factors for VOC emission calculations. The results of the latest calculations also indicate that the source’s potential emissions are less than the PSD major source threshold of 250 tpy of any criteria pollutants. Therefore the source is not subject to the requirements of 326 IAC 2-2.

Pollutant	~~Potential To Emit~~ **Actual Emissions** (tons/yr)
PM	~~11.56~~**0.52**
PM-10	~~11.56~~**0.52**
SO_2	~~0.00~~**0.01**
VOC	~~174.55~~**52.80**
CO	~~0.00~~**0.48**
NO_x	~~0.00~~**2.40**

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	~~Potential To Emit~~ **Actual Emissions** (tons/year)
Single Hap	~~less than 10~~ **greater than 10**
TOTAL **HAP's**	greater than 25

Comment 25

(a) The TSD contains summary tables for the potential to emit for the plant, New Source Air Toxics applicability, and General VOC reduction requirements. After reviewing these tables and the support calculations contained in Appendix A, we are submitting revised emission calculations for most of the emission units. Many calculations in Appendix A contained incorrect materials being used or incorrect maximum capacities for the units. Please review our calculations and update Appendix A and the TSD summary tables as appropriate. Changes/corrections are summarized below:

(b) Barwell Extruder should be referred to as Barwell Extruders. Further, these are insignificant and shouldn't be summarized in the tables with non-insignificant activities.

(c) Line 5 Extruders should be referred to as the Line 5 Extruder.

(d) Lines 8 & 9 Adhesive Application should be referred to as Adhesive Prep Application. Also note that, since the incorrect material was used for the calculations in Appendix A for these emission units, on page 9 of 16 and 12 of 16 xylene was entered for the highest single HAP but it should be toluene.

(e) On page 11 of 16, it is incorrectly stated that Line 3 extruders were constructed prior to the 1997 applicability date. These extruders were constructed in 1999. The reason that the rule is not applicable is because the PTE of any singe and total HAPs are below the applicable thresholds.

(f) Line 2 extruders are not contained in the Table on Page 13 of 16. They are not applicable to 326 IAC 8-1-6 because the PTE VOC is less than 25 tpy.
Both Lines 1 and 2 On-Spray Booths are stated to have a limited PTE VOC of 24 tpy. Neither of the current permits for these booths (9081 and 1993, respectively) have a 24 tpy VOC limit in them. Is this a new limitation? Note that Line 2 spray booths should be identified as "Two Line 2 On-Line HVLP spray booths."

(g) Line 7's current permit contains a limitation of 24 tpy VOC, 24 tpy total HAPS and 9.90 tpy single HAPS. Throughout the Title V permit, it has been stated that Line 7 has now been shown to have potential emissions below these limitations so the limitations are not longer applicable. This is not true. See the attached calculations for Line 7. Appendix A's Line 7 calculation was using an incorrect material and incorrect maximum capacity. For this reason, the summary tables in the TSD need to be updated, Line 7 should be moved from condition D.2.3(a) to D.2.3 (b), and condition D.2.4(d) can be deleted.

(h) The calculations in Appendix A are incorrect for Line 1 On-Line Topcoat Booth, Line 2 HVLP On-Line Booths, Finishing Area 239 Booths, Line 8 Adhesive Prep Application, and Line 9 Adhesive Prep Application because an incorrect material was used for the calculations.

(i) The calculations in Appendix A are incorrect for Line 3 Topcoat Spray Booth because an incorrect VOC content for coating 8370A/C was used.

(j) The calculations in Appendix A are incorrect for Line 2 Adhesive Application and Line 5 Adhesive Application because an incorrect maximum capacity was used.

(k) Appendix A emission calculations for process operations on pages 11 of 15 and forward do not show the emission factor used for the calculations. Please correct this.

(l) Appendix A did not show calculations for the Department 350 RCT Operations.

(m) On Page 13 of 16 in the TSD, the "Date Permitted" column in the table has permit dates for only a few of the emission units. This column could be deleted from the table since all emission units in the table are not applicable to 326 IAC 8-1-6 because the PTE is below the threshold not because of permit dates. If the column cannot be deleted, please fill in the correct permit dates for all emission units.

Response 25

(a) TSD Appendix A has been revised. The new emissions and emission summary is included at the end of this TSD Addendum.

(b) The Barwell Extruders have been moved to the insignificant activities table.

(c) Please see the response to comment 1 for changes.

(d) The emission calculations have been revised and the new emissions and emission summary is included at the end of this Addendum. The Lines 8 & 9 Adhesive Application operations have been revised to refer to the Lines 8 & 9 Adhesive Prep Application, see the response to comment 1 for changes.

(e) Page 11 of 16 of the TSD has been revised as follows to revise the facility descriptions, remove the date permitted information and to revise the reasons that 326 IAC 2-4.1-1 is not applicable:

Facility	~~Date Permitted~~	PTE Single HAP	PTE Total HAPs	Reason 326 IAC 2-4.1-1 is not applicable
Banbury Mills and Mixers	~~N/A~~	0.00	1.98	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
~~Barwell Extruder~~	~~N/A~~	~~0.00~~	~~0.03~~	~~The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively~~
Line 1 Extruders	~~SSM169-11387-00004, issued on March 13, 2000~~	0.00	4.41	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 2 Extruders	~~N/A~~	0.00	4.41	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 3 Extruders	~~169-11083-00004, issued on December 3, 1999~~	0.00	4.41	~~The emission units were constructed prior to the applicability date of July 27, 1997.~~**The PTE of any single and total HAPs are less than 10 and 25 tons per year, respectively**
Line 4 Extruders		**0.00**	**4.41**	**The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively**
Line 5 Extruder~~s~~	~~N/A~~	0.00	4.41	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively

Facility	~~Date Permitted~~	PTE Single HAP	PTE Total HAPs	Reason 326 IAC 2-4.1-1 is not applicable
Line 6 Extruders	~~N/A~~	0.00	4.41	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Department 350 RCT brush application	~~N/A~~	~~0.53~~ **0.00** ~~(toluene)~~	~~3.81~~ **0.00**	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 1 On-Line topcoat spray booth	~~N/A~~	~~15.74~~ **17.3 (toluene)**	~~21.03~~ **22.9**	The emission units were constructed prior to the applicability date of July 27, 1997.
Two (2) Line 2 On-Line HVLP spray booth**s**	~~N/A~~	~~15.74~~ **<10** ~~(toluene)~~ **(xylene)**	~~21.03~~ **<25.0**	The emission units were constructed prior to the applicability date of July 27, 1997.
Line ~~3~~**4** pcoat spray booth	~~SSM169-11387-00004, issued on March 13, 2000~~	~~0.98~~ **9.46** (~~glycol ethers~~) **(xylene)**	~~0.98~~ **12.31**	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Finishing Area 239 HVLP coating operation	~~N/A~~	~~16.05~~ **15.41** (xylene)	~~19.90~~ **19.26**	The emission units were constructed prior to the applicability date of July 27, 1997.
U152 (below belt) Coating Booth	~~169-12230-00004, issued on June 23, 2000~~	9.89 (toluene)	11.83	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 1 adhesive application booth	~~SSM169-11387-00004, issued on March 13, 2000~~	12.42 (xylene)	23.35	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 2 adhesive application booth	~~N/A~~	~~1.64~~ **<10** (xylene)	~~21.03~~ **<25.0**	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 3 adhesive application booth	~~N/A~~	~~1.09~~ **9.08** (xylene)	~~2.06~~ **17.07**	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 5 adhesive application booth	~~N/A~~	~~1.64~~ **< 10** (xylene)	~~3.08~~ **<25.0**	The PTE of any single and total HAPs are **limted to** less than less than 10 and 25 tons per year, respectively
Line 7 adhesive application booth	~~CP169-9774-00004, issued on August 18, 1998~~	~~3.28~~ **< 10** ~~(xylene)~~ **(MEK)**	~~6.17~~ **<25.0**	The PTE of any single and total HAPs are **limited to** less than less than 10 and 25 tons per year, respectively
Line 8 adhesive **prep** application booth	~~N/A~~	~~3.28~~ **2.91** (xylene)	~~6.17~~ **3.74**	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 9 adhesive **prep** application booth	~~N/A~~	~~3.28~~ **4.25** (xylene)	~~6.17~~ **5.46**	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Honda Spray Coating Operation		**1.92 (toluene)**	**2.27**	**The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively**

(f) Line 2 has been added to the table on page 13 of 16 of the TSD. The PTE for the Lines 1 and 2 On-Spray Booths have been recalculated (see corrected emission calculations at the end of this addendum), and Line 1 has been revised to list the new potential to emit. The 326 IAC 8-1-6 (General VOC Reduction Requirements) table on page 13 of 16 has been revised as follows:

Facility	~~Date Permitted~~	PTE of VOC	Reason 326 IAC 8-1-6 is not applicable
Banbury Mills and Mixers	~~N/A~~	0.52	The PTE of VOC is less than 25 tons per year
Line 1 Extruders	~~SSM169-11387-00004, issued on March 13, 2000~~	~~3.63~~ **8.50**	The PTE of VOC is less than 25 tons per year
Line 2 Extruders		**8.50**	**The PTE of VOC is less than 25 tons per year**
Line 3 Extruders	~~169-11083-00004, issued on December 3, 1999~~	~~3.63~~ **8.50**	The PTE of VOC is less than 25 tons per year
Line 4 Extruders		**8.50**	**The PTE of VOC is less than 25 tons per year**
Line 5 Extruder~~s~~	~~N/A~~	~~3.63~~ **8.50**	The PTE of VOC is less than 25 tons per year
Line 6 Extruders	~~N/A~~	~~3.63~~ **8.50**	The PTE of VOC is less than 25 tons per year
Department 350 RCT brush application	~~N/A~~	~~4.16~~ **3.60**	The PTE of VOC is less than 25 tons per year
Line 1 On-Line topcoat spray booth	~~N/A~~	~~24.00~~ **<25.0**	The PTE of VOC is limited to less than 25 tons per year
Line 2 **Two (2)** On-Line HVLP spray booth**s and adhesive booth**	~~N/A~~	~~24.00~~ **<25.0**	The PTE of VOC is limited to less than 25 tons per year
Line 3 topcoat spray booth	~~SSM169-11387-00004, issued on March 13, 2000~~	~~0.93~~ **4.81**	The PTE of VOC is less than 25 tons per year
U152 (below belt) Coating Booth	~~169-12230-00004, issued on June 23, 2000~~	12.68	The PTE of VOC is less than 25 tons per year
Line 1 adhesive application booth	~~SSM169-11387-00004, issued on March 13, 2000~~	24.00	The PTE of VOC is limited to less than 25 tons per year
~~Line 2 adhesive application booth~~	~~N/A~~	~~3.17~~	~~The PTE of VOC is less than 25 tons per year~~
Line 5 adhesive application booth		**<25.0**	**The PTE of VOC is limited to less than 25 tons per year and the booth is subject to the BACT requirements of D.2.3(c).**
Line ~~3~~**4** adhesive application booth	~~N/A~~	~~2.11~~ **17.52**	The PTE of VOC is less than 25 tons per year
Line 7 adhesive application booth	~~CP169-9774-00004, issued on August 18, 1998~~	~~6.34~~ **<25.0**	The PTE of VOC is **limited to** less than 25 tons per year
Line 8 adhesive **prep** application booth	~~N/A~~	~~6.34~~ **3.59**	The PTE of VOC is less than 25 tons per year

Facility	~~Date Permitted~~	PTE of VOC	Reason 326 IAC 8-1-6 is not applicable
Line 9 adhesive **prep** application booth	~~N/A~~	~~6.34~~ **3.59**	The PTE of VOC is less than 25 tons per year
Honda Spray Coating Operation	~~N/A~~	**2.44**	The PTE of VOC is less than 25 tons per year

(g) Condition D.2.4(d) has been removed from the draft Title V permit

(h) - (k) TSD Appendix A has been revised and the new emissions and emission summary is included in this Addendum.

(l) Page 11 of 15 and forward of TSD Appendix A lists an emission factor that is shown in pounds per pounds of material processed under the Emission Factor Column. The emission are calculated using the following methodology: Maximum Rate (lbs/hr) x Emission Factor (lb/lb processed) = Emission Rate (lb/hr) x 8,760 hr/year / 2000lbs/ton = Maximum Uncontrolled Emissions (tons/yr) x Control Efficiency (%) = Maximum Controlled Emissions (tons/yr).

(m) Page 13 of 15 of TSD Appendix A contains the Department 350 RCT operation calculations. The calculations were mislabeled Banbury Mills1- Barwell Plug Press and Banbury Mills1-RCT-9217. The "Date Permitted" column has been deleted. Please see the response to comment 23, part (e).

Comment 26
GDX Automotive requests that the pressure drop range listed in Condition D.1.5 be changed from 5 and 15 inches of water to 1 and 10 inches of water to more accurately reflect the actual pressure drop range.

Response 26
In addition to the change in the pressure drop range, IDEM has decided to make other revisions to Condition D.1.5 to clarify the facility specific events that would not qualify as a deviation, as follow:

D.1.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across baghouses (BH02 - BH08 and BH10); used in conjunction with the Banbury Mills and Compound handling at least once per shift when the Banbury Mills and Compound handling are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise,~~ **When for any one reading**, the pressure drop across the baghouses ((BH02 - BH08 and BH10) ~~shall be maintained within~~ **is outside** the **normal** range of ~~5 and 15~~ **1 and 10** inches of water or a range established during the latest stack test~~. The~~**, the Permittee shall take reasonable response steps in accordance with Section C-** Compliance Response Plan **- Preparation, Implementation, Records, and Reports**~~. for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **A pressure reading that is outside the above mentioned range is not a deviation from this permit.** Failure to take response steps in accordance with Section C - Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports**, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ**,** and shall be calibrated at least once every six (6) months.

The revised emission summary, and new emission calculations are included below:

Appendix A: Emission Calculations

Page 1 of 15 TSD App A

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Uncontrolled Potential Emissions (tons/year)
Emissions Generating Activity

Pollutant	Combustion	Banbury Mills	Compd. Handling	Barwell Ext.	Ext. Line 1	Ext. Line 2	Ext. Line 3	Ext. Line 4	Ext. Line 5	Ext. Line 6	Dept. 350 RCT Brush	Line 1 On-Line Topcoat Booth	**Line 2 Spray & Adhesive Booths**	Line ~~3~~ **4** Topcoat Spray Booth	Finishing Area 239	U152 Coating Booth	Line 1 Adhesive Application	Honda Spray Booth	Line 3 Adhesive Application	Line 5 Adhesive Application	Line 7 Adhesive Application	Line 8 Adhesive Application	Line 9 Adhesive Application	TOTAL
PM	0.16	7.88	80.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.54~~ **3.68**	~~0.54~~ **1.10**	~~0.93~~ **3.69**	~~0.17~~ **2.28**	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~91.52~~ **100.09**
PM10	0.65	7.88	80.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.54~~ **3.68**	~~0.54~~ **1.10**	~~0.93~~ **3.69**	~~0.17~~ **2.28**	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~92.01~~ **100.58**
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.66
VOC	0.47	~~0.52~~ **2.61**	0.00	0.00	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~4.16~~ **3.60**	~~24.00~~ **4.79**	~~24.00~~ **50.80**	~~9.93~~ **13.42**	~~19.23~~ **18.57**	12.68	24.00	2.44	~~2.11~~ **17.52**	~~3.17~~ **25.75**	~~6.34~~ **37.97**	~~6.34~~ **3.59**	~~6.34~~ **5.38**	~~155.61~~ **268.59**
CO	7.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.18
total HAPs	0.15	1.98	0.00	0.03	4.41	4.41	4.41	4.41	4.41	4.41	~~3.84~~ **-0.00**	~~21.03~~ **0.93**	~~21.03~~ **45.70**	~~0.08~~ **0.93**	~~10.09~~ **19.26**	11.83	23.35	2.27	~~2.06~~ **17.07**	~~3.08~~ **25.09**	~~6.17~~ **37.07**	~~6.17~~ **3.74**	~~6.17~~ **5.46**	~~152.85~~ **221.32**
worst case single HAP	(hexane) 0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.53~~ **0.00**	~~(toluene) 15.74~~ **(glycol ether)0.93**	(toluene) ~~15.74~~ **34.60**	(glycol ethers)~~0.08~~ **0.93**	(xylene~~)~~ ~~15.05~~ **15.41**	(toluene) 9.89	(xylene) 12.42	(toluene) 1.92	(xylene)~~,~~ ~~1.09~~ **9.08**	(xylene)~~,~~ ~~1.54~~ **13.34**	~~(xylene), 3.28~~ **(MEK) 27.87**	(xylene) ~~3.28~~ **2.91**	(xylene) ~~3.28~~ **4.25**	(xylene) ~~62.36~~ **57.41**

Total emissions based on rated capacity at 8,760 hours/year.

~~Controlled~~ **Limited** Potential Emissions (tons/year)
Emissions Generating Activity

Pollutant	Combustion	Banbury Mills	Compound Handling	Barwell Ext.	Ext. Line 1	Ext. Line 2	Ext. Line 3	Ext. Line 4	Ext. Line 5	Ext. Line 6	Dept. 350 RCT Brush	Line 1 On-Line Topcoat Booth	**Line 2 Spray & Adhesive Booths**	Line ~~3~~ **4** Topcoat Spray Booth	Finishing Area 239	U152 Coating Booth	Line 1 Adhesive Application	Honda Spray Booth	Line 3 Adhesive Application	Line 5 Adhesive Application	Line 7 Adhesive Application	Line 8 Adhesive Application	Line 9 Adhesive Application	TOTAL
PM	0.16	0.08	1.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.54~~ **3.68**	~~0.54~~ **1.10**	~~0.93~~ **3.69**	~~0.17~~ **2.28**	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~91.52~~ **13.07**
PM10	0.65	0.08	1.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.54~~ **3.68**	~~0.54~~ **1.10**	~~0.93~~ **3.69**	~~0.17~~ **2.28**	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~92.01~~ **13.56**
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.66
VOC	0.47	~~0.52~~ **2.61**	0.00	0.00	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~3.63~~ **8.50**	~~4.16~~ **3.60**	~~24.00~~ **4.79**	~~24.00~~ **<25.0**	~~9.93~~ **13.42**	~~19.23~~ **18.57**	12.68	24.00	2.44	~~2.11~~ **17.52**	~~3.17~~ **<25.00**	~~6.34~~ **<25.00**	~~6.34~~ **3.59**	~~6.34~~ **5.38**	~~155.61~~ **<235.07**
CO	7.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.18
total HAPs	0.15	1.98	0.00	0.03	4.41	4.41	4.41	4.41	4.41	4.41	~~3.84~~ **-0.00**	~~21.03~~ **0.93**	~~21.03~~ **<25.0**	~~0.08~~ **0.93**	~~10.09~~ **19.26**	11.83	23.35	2.27	~~2.06~~ **17.07**	~~3.08~~ **<25.0**	~~6.17~~ **<25.00**	~~6.17~~ **3.74**	~~6.17~~ **5.46**	~~152.85~~ **<188.46**
worst case single HAP	(hexane) 0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	~~0.53~~ **0.00**	~~(toluene) 15.74~~ **(glycol ether)0.93**	(toluene) ~~15.74~~ **<10.0**	(glycol ethers)~~0.08~~ **0.93**	(xylene~~)~~ ~~15.05~~ **15.41**	(toluene) 9.89	(xylene) 12.42	(toluene) 1.92	(xylene)~~,~~ ~~1.09~~ **9.08**	(xylene)~~,~~ ~~1.54~~ **<10.0**	~~(xylene), 3.28~~ **(MEK) <10.0**	(xylene) ~~3.28~~ **2.91**	(xylene) ~~3.28~~ **4.25**	(xylene) ~~62.36~~ **<54.07**

Total emissions based on rated capacity at 8,760 hours/year.

Note: Emissions for Extrusion Lines 1-6, Banbury Mix and Mill, Line 2 Spray Coating and Adhesive Application, Line 4 Coating Operations, Honda Spray Coating Operations and Finishing Area 239 Primer Operation were provided by the source in the October 5, 2001 letter. The emission calculations were reviewed by the IDEM and were determined to be accurate.

	Coating Type	lbs VOC/gal coating	Potential Usage		Potential Emissions	
			gal/day	gal/yr	lb/day	TPY
Dept. 350 RCT Brush	9217	6.65	1.50	548	9.97	1.82
	9206	6.51	1.50	548	9.771.78	
Total					19.74	3.60

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 5 - Adhesive Application Booth																	
Flock-Loc 852 Adhesive	8.29	48.25%	0.0%	48.2%	0.0%	45.40%	0.00147	1000.000	4.00	4.00	5.88	141.12	25.75	0.00	8.81	100%	
State Potential Emissions			Add worst case coating to all solvents								5.88	141.12	25.75	0.00			
							Limit Usage:	Limit Usage:	Control Efficiency:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:			
							PM	VOC	VOC	PM	VOC lbs	VOC lbs	VOC tons	PM			
											per Hour	per Day	per Year				
							0.00%	0.00%	0.00%	0.00%	5.88	141.12	25.75	0.00			

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenylmethane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 5 - Adhesive Application Booth																								
Flock-Loc 852 Adhesive	8.3	0.00147	1000.000	25.00 %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00 %	10.00 %	13.34	0.00	0.00	0.00	0.00	0.00	0.00	1.07	5.34	5.34	
														13.34	0.00	0.00	0.00	0.00	0.00	0.00	1.07	5.34	5.34	25.09
Total State Potential Emissions																								
											Limit Usage:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	
											VOC		PM											
											0.00%		0.00	13.34	0.00	0.00	0.00	0.00	0.00	0.00	1.07	5.34	5.34	25.09

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 3 - Adhesive Application Booth																	
Flock-Loc 852 Adhesive	8.29	48.25%	0.0%	48.2%	0.0%	45.40%	0.00100	1000.000	4.00	4.00	4.00	96.00	17.52	0.00	8.81	100%	
State Potential Emissions			Add worst case coating to all solvents								4.00	96.00	17.52	0.00			

Limit Usage:	Limit Usage:	Control Efficiency:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	
PM	VOC	VOC	PM	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM	
0.00%	0.00%	0.00%	0.00%	4.00	96.00	17.52	0.00	

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenylmethane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 3 - Adhesive Application Booth																								
Flock-Loc 852 Adhesive	8.3	0.00100	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	9.08	0.00	0.00	0.00	0.00	0.00	0.00	0.73	3.63	3.63	
														9.08	0.00	0.00	0.00	0.00	0.00	0.00	0.73	3.63	3.63	17.07
Total State Potential Emissions																								

Limit Usage:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	
VOC		PM											
0.00%		0.00	9.08	0.00	0.00	0.00	0.00	0.00	0.00	0.73	3.63	3.63	17.07

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line ~~3~~ 4 - Topcoat Spray Booth																	
Coating 8370A/8370C	8.9	24.58%	0.0%	24.6%	0.0%	45.40%	0.50000	1.000	2.19	2.19	1.10	26.34	4.81	3.69	4.83	75%	
State Potential Emissions			Add worst case coating to all solvents								1.10	26.34	4.81	3.69			

Control Efficiency:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:			
VOC	PM	VOC lbs per Hour	VOC lbs per Day	VOC tons per Year	PM			
0.00%	80.00%	1.10	26.34	4.81	0.74			

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenylmethane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Topcoat Spray Booth for Line #3																								
Coating 8370A/8370C	8.9	0.50000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	4.75%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.93	0.00	0.00	0.00	0.00	
														0.00	0.00	0.00	0.00	0.00	0.93	0.00	0.00	0.00	0.00	0.93

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 2- HVLP On Line Booth 1																	
HS-33-EX-1	7.8	74.36%	0.0%	74.4%	0.0%	21.35%	1.00000	1.000	5.80	5.80	1.45	34.80	6.35	0.55	27.17	75%	
Line 2- HVLP On Line Booth 2																	
HS-33-EX-1	7.8	74.36%	0.0%	74.4%	0.0%	21.35%	1.00000	1.000	5.80	5.80	5.80	139.20	25.40	0.55	27.17	75%	
Line 2 - Adhesive Application Booth																	
Flock Adhesive	8.3	48.00%	0.0%	48.0%	0.0%	45.40%	1.50000	1.000	3.98	5.98	5.07	143.50	26.19	0.00	8.76	100%	
Potential Emissions			Add worst case coating to all solvents								17.58	411.90	76.99	1.10			

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Ethylbenzene Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Total
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenylmethane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Line 2- HVLP On Line Booth 1																							
HS-33-EX-1														3.20	17.30	0.80	0.00	0.00	0.00	0.00	0.00	1.50	22.80
Line 2- HVLP On Line Booth 2																							
HS-33-EX-1														3.20	17.30	0.80	0.00	0.00	0.00	0.00	0.00	1.50	22.80
Line 2 - Adhesive Application Booth																							
Flock Adhesive														13.64	0.00	5.45	0.00	0.00	0.00	0.00	1.09	5.45	25.63
														13.64	34.60	5.45	0.00	0.00	0.00	0.00	1.09	5.45	45.60

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 7 - Adhesive Application Booth																	
Flock-Lok 7000 Adhesive	7.4	70.00%	0.0%	70.0%	0.0%	45.40%	0.00086	1000.000	5.18	5.18	4.45	106.92	19.51	0.00	11.41	100%	
Flock-Lok 7204 Adhesive	7.9	75.03%	0.0%	75.0%	0.0%	45.40%	0.00043	1000.000	5.95	5.95	2.56	61.40	11.21	0.00	13.11	100%	
Chemglaze	7.5	100.00 %	0.0%	100.0 %	0.0%	45.40%	0.00022	1000.000	7.53	7.53	1.66	39.76	7.26	0.00	16.59	100%	
State Potential Emissions			Add worst case coating to all solvents								8.67	208.08	37.97	0.00			

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	MEK Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	MEK	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenylmethane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 7 - Adhesive Application Booth																								
Flock-Lok 7000 Adhesive	7.4	0.00086	1000.000	0.00%	100.00 %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	27.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Flock-Lok 7204 Adhesive	7.9	0.00043	1000.000	30.00 %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Chemglaze	7.5	0.00022	1000.000	50.00 %	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	15.00%	3.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09	
														8.11	27.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.09	37.07
Total State Potential Emissions																								

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	
Line 8 - Adhesive prep Application Booth																	
Tile-R-bond	7.2	90.34%	0.0%	90.3%	0.0%	45.40%	0.00012	1000.000	6.55	6.55	0.82	19.65	3.59	0.00	14.43	100%	
State Potential Emissions			Add worst case coating to all solvents								0.82	19.65	3.59	0.00			

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenyl methane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 8 - Adhesive prep Application Booth																								
Tile-R-bond	7.3	0.00013	1000.000	19.95 %	70.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.83	2.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
														0.83	2.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.74
Total State Potential Emissions																								

	Limit Usage:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:	
	VOC		PM											
	0.00%		0.00	0.83	2.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.74

Line 9 - Adhesive prep Application Booth

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Tile-R-bond	7.2	90.34%	0.0%	90.3%	0.0%	45.40%	0.00019	1000.000	6.55	6.55	1.23	29.47	5.38	0.00	14.43	100%
State Potential Emissions			Add worst case coating to all solvents								1.23	29.47	5.38	0.00		

							Limit Usage:	Limit Usage:	Control Efficiency:		Limit Usage:	Limit Usage:	Limit Usage:	Limit Usage:		
							PM	VOC	VOC	PM	VOC lbs	VOC lbs	VOC tons	PM		
											per Hour	per Day	per Year			
							0.00%	0.00%	0.00%	0.00%	1.23	29.47	5.38	0.00		

Material	Density	Gallons of Material	Maximum	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Formaldehyde Emissions	Benzene Emissions	Hexane Emissions	Glycol Ethers Emissions	Methanol Emissions	4,4' - Diphenylmethane diisocyanate Emissions	Methyl Isobutyl Ketone Emissions	Ethyl Benzene Emissions	
	(Lb/Gal)	(gal/unit)	(unit/hour)	Xylene	Toluene	Formaldehyde	Benzene	Hexane	Glycol Ethers	Methanol	4,4' - Diphenyl methane diisocyanate	Methyl Isobutyl Ketone	Ethyl Benzene	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	
Line 9 - Adhesive prep Application Booth																								
Tile-R-bond	7.3	0.00019	1000.000	19.95%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.21	4.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	5.46

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted):

(1) The OAQ has revised the permit to replace the old name of Office of Air Management (OAM) with the new name of the Office of Air Quality (OAQ).

(2) Condition B.2, Permit Term has included the rule cite 326 IAC 2-1.1-9.5.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

(3) Condition B.8 (Compliance with Permit Conditions) has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(~~b~~**c**) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(~~c~~**d**) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

(4) B.14 (Multiple Exceedances) has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed.

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

(5) B.14 (Prior Permit Conditions Superseded) was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

(6) The IDEM, OAQ, has revised Condition B.15 (Deviations from Permit Requirements and Conditions) to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

(7) B.12 (Emergency Provisions) (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

(8) Condition B.13 (Permit Shield) (b) has been removed since B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

~~(c)~~**(b)** If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

~~(d)~~**(c)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

~~(e)~~**(d)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(f)~~**(e)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(g)~~**(f)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(h)~~**(g)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

(9) Condition C.7 (Asbestos Abatement Projects) has been revised so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. Also, condition C.16 has been revised, it requires that a certification by the responsible official for the notification sent in response to non-compliance with a stack test.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(10) The IDEM, OAQ has restructured C.15 to clarify the contents and implementation of the compliance response plan. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. Also, in Condition C.15(c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed.

C.15 Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the **Permittee, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities**. ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Gencorp, Inc.
Source Location:	One General Street, Wabash, Indiana 46992
County:	Wabash
SIC Code:	3069, 3089
Operation Permit No.:	T169-5650-00004
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Gencorp, Inc., relating to the operation of a rubber product manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Banbury Mills and Mixers, constructed in 1965 and permitted in 1980, consisting of three (3) Banbury Mixers and three (3) Banbury Mills, with a maximum capacity of 11,100 pounds per hour, using six (6) baghouses (CE02, CE03, CE04, CE05, CE06) as particulate control and exhausting to six (6) stacks (R-23, R-24, R-25, R-26, R-34 and R-38);

(b) Compound handling, constructed in 1984 and 1985, consisting of carbon black unloading, carbon black conveying, and weigh stations, with a maximum capacity of 15 tons per hour, using four (4) baghouses (CE07, CE08, CE09, CE10) as particulate control, exhausting to four (4) stacks (R-15, R-36, R-37 and R-40);

(c) Extrusion Line 1, consisting of the following:

(1) Two (2) Line 1 Extruders, with a maximum total capacity of 1000 pounds per hour, and exhausting to the interior of the building;

(2) One (1) Line 1 natural gas hot air oven, with a rated heat input of 3.2 million British thermal units (mmBtu) per hour, and exhausting to stacks F2-15, F2-21, F2-28, and F2-33; and

(3) One (1) Line 1 flock adhesive application booth, with a maximum capacity of 12.45 pounds per hour of adhesive, and exhausting to stack F3-1.

(4) One (1) Line 1 On-Line topcoat booth, equipped with two (2) HVLP spray guns , with a maximum capacity of 0.5 gallons of coating per hour, used to coat truck door seals, with dry filters as control, exhausting to one stack (F2-41); and

(5) Two (2) electric IR ovens, constructed in 1997.

(d) Extrusion Line 2, consisting of the following:
(1) Two (2) Line 2 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
(2) One (1) 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven, constructed in 1986 and 1987, exhausting to six (6) stacks (F2-14, F2-20, F2-30, F2-31, F2-38 and F2-42);
(3) One (1) Line 2 drip and wipe adhesive application booth, with a maximum capacity of 1.5 gallons of adhesive per hour, constructed in 1986 and 1987, and exhausting to stack (F-3-2);
(4) Two (2) Line 2 HVLP spray booths, constructed in 1991, exhausting to two (2) stacks (F2-10 and F2-13)

(e) Extrusion Line 3, consisting of the following:
(1) Two (2) Line 3 rubber extruders, with a total maximum capacity of 1000 lb. rubber extruded per hour;
(2) Five (5) natural gas fired hot air ovens, each rated at 1.0 million BTU per hour, exhausting through stacks/vents F2-50 through F2-54;
(3) One (1) Line 3 adhesive application booth, utilizing brush-and-wipe methods, exhausting through stack/vent F2-55; and
(4) One (1) Line 3 topcoat spray booth, utilizing HVLP application methods, exhausting through stack/vent F2-56.

(f) Extrusion Line 5, constructed in 1989, consisting of:
(1) Two (2) Line 5 extruders with a total maximum capacity of 1000 pounds of extruded rubber per hour;
(2) One (1) Line 5 5.6 million British thermal units per hour (mmBtu/hr) natural gas fired curing oven exhausting to ten (10) stacks (F2-22, F2-23, F2-29, F2-32, F2-36, F2-43, F2-44, F3-3, and F3-6); and
(3) one (1) Line 5 drip and wipe adhesive application booth, with a maximum capacity of 1 gallon of adhesive per hour, exhausting to one (1) stack (F3-15).

(g) One (1) HVLP coating operation for Finishing Area 239, constructed in 1989, using dry filters as particulate control and exhausting to one stack (S-24).

(h) Extrusion Line 6, constructed in 1978 and 1985, consisting of two (2) extruders and one (1) liquid salt curing bath, with a maximum capacity of 1,000 pounds per hour and exhausting to two (2) stacks (F2-16 and F2-24);

(i) Department 350 RCT brush application with a maximum capacity of 3 gallons per day, exhausting inside the building

(j) Line 8 plastic parts adhesive application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive and exhausting to stack F2-48;

(k) Line 9 plastic parts adhesive application station using a roller application system, constructed in 1998, with a maximum capacity of 3 gallons per day of adhesive and exhausting to stack F2-49;

(l) One (1) Line 7 plastic parts adhesive application station using a brush application system with two (2) electric IR ovens, constructed in 1998, with a maximum capacity of coating 270 ft^2 of plastic products per hour, exhausting to three (3) stacks (F2-45, F2-46 and F2-47);

(m) One (1) below belt coating operation consisting of:
  (1) One (1) below belt spray coating booth with a maximum capacity of 212 rubber vehicle sealing parts per hour, identified as U152 and exhausting to stack SV F3-12, and

  (2) Three (3) electric IR ovens exhausting to stack SV F3-13.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new emission units and pollution control equipment receiving advanced source modification approval during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
  (1) Fifty two (52) natural gas fired heaters, each with less than 1.3 mmBtu per hour heat input.
(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons:
  (1) One (1) 500 gallon gasoline storage tank.
(c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month:
  (1) One (1) 300 gallon diesel storage tank.
(d) One (1) Natural draft cooling tower not regulated under a NESHAP;
(e) Paved and unpaved roads and parking lots with public access;
(f) Blowdown for any of the following; sign glass, boiler, compressors, pumps, and cooling tower;
(g) Diesel generators not exceeding 1,600 horsepower;
(h) Grinding and machining operation controlled with fabric filter, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
(i) A laboratory as defined in 326 IAC 2-7-1 (2)(C).
(j) Other activities or categories no previously identified with a potential to emit less than significant levels:
  (1) Line 7 plastic extruders, flock system, and IR ovens:
  (2) Line 8 plastic extruders
  (3) Line 9 plastic extruders;
  (4) Maintenance Wood Shop: one (1) wheel sander, one (1) belt sander, one (1) router, one (1) radial arm saw, one (1) table saw, one (1) planer, one (1) bandsaw, and two (2) drill presses;
  (5) Maintenance metal and mill wright shop: three (3) portable arc welders, parts cleaners, nine (9) grinders, fourteen (14) drill presses, ten (1) metal lathes, two (2) portable cutting torches, one (1) enclosed sandblaster, one (1) grinder/honer, one (1) jigsaw, one (1) bandsaw, and one (1) cutting wheel;
  (6) Prototype Laboratory for research and development;
  (7) Constant temperature laboratory for research and development;

(8) Mill laboratory for research and development;
(9) Research and new product development (Area 571);
(10) Development and Engineering center for research and development;
(11) P207 Finishing area, consisting of two (2) topcoat spray booths;
(12) Maintenance area 220 enclosed abrasive blast;
(13) Three (3) Portable Inking Stations for Area 235 and Three (3) Portable Inking Stations for Department 360;
(14) Area 235 internal vacuum bags for flock material;
(15) Area 207 Small quantity weigh station bag baler;
(16) Area 207 Hy-Vac cleanup;
(17) Area 207 Littleford day mixer;
(18) Area 207 12,000 gallon rubber mixing oil tanks (5);
(19) Two (2) Barwell Extruders, exhausting inside the building; and
(20) One (1) Plug Press and RCT application, constructed in 1987, with a maximum capacity of 100 pounds per hour, exhausting to one (1) stack (S-18).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Operation Permit (OP 85-06-85-0127), issued on July 27, 1981:
(b) Exemption, issued on June 18, 1984;
(c) Registration, issued on July 24, 1984;
(d) Exemption, issued on February 3, 1986;
(e) Registration, issued on May 18, 1997;
(f) Exemption, issued on September 7, 1987;
(g) Exemption, issued on January 9, 1989;
(h) Construction Permit (PC (85) 1721), issued on January 9, 1989;
(i) Registration, issued on August 24, 1989;
(j) Construction Permit (169-1993-00004), issued on September 6, 1991;
(k) Construction Permit (169-2825-00004);
(l) Registration (CP 169-3590-00004), issued on March 28, 1994;
(m) Exemption (CP 169-3888-00004), issued on August 16, 1994;
(n) Registration (CP 169-3802-00004), issued on November 4, 1994;
(o) Construction Permit (169-4072-00004), issued on February 13, 1995;
(p) Operation Permit (OP 169-0004), issued on February 26, 1996;
(q) Registration (CP 169-9081-00004), issued on December 18, 1997;
(r) Operation Permit (OP 169-9774-00004), issued on August 18, 1998;
(s) Amendment (169-11456-00004), issued on November 4, 1999
(t) First Significant Source Modification (169-11083-00004), issued on December 3, 1999;
(u) Second Significant Source Modification (169-11387-00004), issued on March 13, 2000; and
(v) First Minor Source Modification (169-12230-00004), issued on June 23, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) Operation Permit (OP 85-06-85-0127), issued on July 27, 1981

Condition: Entire Permit

Reason not incorporated: the emission units permitted in this approval have since been removed from operation.

(b) Operation Permit (PC (85) 1721), issued on January 11, 1989

Condition: Entire Permit

Reason not incorporated: the emission units permitted in this approval have since been included in Construction Permit (169-1993-00004), issued on September 6, 1991.

(c) (1) Operation Permit 169-2825-00004;

Condition 6: That a record of the surface coating quantities and organic solvent contents shall be maintained for a minimum period of 24 months and made available upon request of the Office of Air Management. Any change or modification which may increase potential emissions to 40 tons per year from the equipment covered in this permit shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change may occur.

(2) Construction Permit (169-1993-00004), issued on September 6, 1991:

Condition 4: That input of volatile organic compounds (VOC) to production line No. 2 shall be limited to 39.9 tons per year, based on a twelve month average rolled on a monthly basis. During the first 12 months of operation, VOC usage shall be limited such that, total VOC used divided by months of operation shall not exceed 3.32 tons per month.

(3) Construction Permit (169-4072-00004), issued on February 13, 1995:

Condition 5: That usage of VOC shall be limited to 39 tons per 365 day period rolled on a daily basis. During the first 12 months of operation, VOC usage shall be limited such that, total VOC used shall not exceed 214 pounds per day. Satisfaction of this Operating Condition shall render the Emission Offset rule, 326 IAC 2-3, not applicable in this case.

(4) Amendment (169-11456-00004), issued on November 4, 1999:

Condition: The new operation condition #5 of [CP 169-4072-00004] shall read:

That usage of VOC shall be limited to 39 tons per 12 month period rolled on a monthly basis. Satisfaction of this Operating Condition shall render the Prevention of Significant Deterioration (PSD) rule, 326 IAC 2-2 and 40 CFR 52.21, not applicable in this case.

Reason not incorporated: During the Part 70 permit review, it was determined that, based on the latest USEPA approved emission factors listed in AP-42 for the operations associated with the source, the potential uncontrolled VOC emissions form the source never exceeded 250 tons per year and has always been a PSD minor source. Therefore, these conditions are not required for the source to be a minor PSD source.

(d) Construction Permit 169-9774-00004, issued on August 18, 1998

(1) Condition: 10 BACT Synthetic Minor Limitation
That input of volatile organic compounds (VOC), including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the adhesive application station shall be limited to 24 tons per year, based on a twelve (12) consecutive month period, rolled on a monthly basis, therefore, 326 IAC 8-1-6 will not apply.

(2) Condition: 11 MACT Synthetic Minor Limitation
That input of single and total hazardous air pollutants (HAP), including clean up solvent, minus the HAP solvent shipped out, delivered to the applicators of the adhesive application station shall be limited to 9.90 and 24 tons per year, respectively, based on a twelve (12) consecutive month period, rolled on a monthly basis, therefore, 326 IAC 2-1-3.4 will not apply.

Reason not incorporated:
the emission unit permitted in this approval have since been identified as the Line 7 adhesive application station, and based on the latest emission calculations for this emission unit, the PTE of VOC, any single and total HAPs are less than less than 25, 10 and 25 tons per year, respectively. Therefore, 326 IAC 8-1-6 and 326 IAC 2-4.1-1 (formerly 326 IAC 2-1-3.4) do not apply.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 1, 1996.

A notice of completeness letter was mailed to the source on January 16, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 15.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	104.36
PM-10	104.85
SO_2	0.05
VOC	155.64
CO	7.18
NO_x	8.66

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Toluene	greater than 10
Methanol	less than 10
Methanol	less than 10
4.4 Diphenylmethane Diisocyanate	less than 10
Methyl Isobutyl Ketone	greater than 10
Xylene	greater than 10
Ethyl Benzene	greater than 10
TOTAL	greater than 25

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the potential to emit table from the second significant source modification SSM169-11387-00004, issued on March 13, 2000.

Pollutant	Potential To Emit (tons/year)
PM	0.52
PM-10	0.50
SO_2	0.01
VOC	52.80
CO	0.48
NO_x	2.40

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Single Hap	less than 10
TOTAL	greater than 25

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Natural Gas Combustion	0.16	0.65	0.05	0.47	7.18	8.54	(hexane) 0.15	0.15
Banbury Mills	0.08	0.08	0.00	0.52	0.00	0.00	0.00	1.98
Compound Handling	1.19	1.19	0.00	0.00	0.00	0.00	0.00	0.00
Barwell Extruder	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.03
Line 1 Extruders	0.00	0.00	0.00	3.63	0.00	0.00	0.00	4.41
Line 2 Extruders	0.00	0.00	0.00	3.63	0.00	0.00	0.00	4.41
Line 3 Extruders	0.00	0.00	0.00	3.63	0.00	0.00	0.00	4.41
Line 5 Extruders	0.00	0.00	0.00	3.63	0.00	0.00	0.00	4.41
Line 6 Extruders	0.00	0.00	0.00	3.63	0.00	0.12	0.00	4.41
Dept. 350 RCT brush	0.00	0.00	0.00	4.16	0.00	0.00	(toluene) 0.53	3.81
Line 1 On-Line Topcoat Booth	0.54	0.54	0.00	24.00	0.00	0.00	(xylene) 15.74	21.03
Line 2 On-Line HVLP Booth	0.54	0.54	0.00	24.00	0.00	0.00	(xylene) 15.74	21.03
Line 3 Topcoat Spray Booth	0.93	0.93	0.00	0.93	0.00	0.00	(glycol ethers) 0.98	0.98
Finishing Area 239 HVLP coating operation	0.02	0.02	0.00	19.23	0.00	0.00	(xylene) 16.05	19.90
U152 Coating Booth	0.18	0.18	0.00	12.68	0.00	0.00	(toluene) 9.89	11.83
Line 1 Adhesive Application	0.00	0.00	0.00	24.00	0.00	0.00	(xylene) 12.42	23.35
Line 2 Adhesive Application	0.00	0.00	0.00	3.17	0.00	0.00	(xylene) 1.64	3.08
Line 3 Adhesive Application	0.00	0.00	0.00	2.11	0.00	0.00	(xylene) 1.09	2.06
Line 5 Adhesive Application	0.00	0.00	0.00	3.17	0.00	0.00	(xylene) 1.64	3.08
Line 7 Adhesive Application	0.00	0.00	0.00	6.34	0.00	0.00	(xylene) 3.28	6.17

	Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Total HAPs
Line 8 Adhesive Application	0.00	0.00	0.00	6.34	0.00	0.00	(xylene) 3.28	6.17
Line 9 Adhesive Application	0.00	0.00	0.00	6.34	0.00	0.00	(xylene) 3.28	6.17
Total Emissions	3.64	4.13	0.05	155.61	7.18	8.66	(xylene) 52.36	152.87
PSD significance levels	250	250	250	250	250	250	N/A	N/A

County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Wabash County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Wabash County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Subpart BBB is not applicable since the product is not rubber tires.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on April 1, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration)

At the time that Indiana State Operating Permits OP 169-00004 and CP 169-1993, dated September 6, 1991, were issued the source had calculated potential emissions of VOC that exceeded the PSD limit of 250 tpy, based on the emission factors listen in AP-42 at that time, and the source was previously designated as a major PSD source. Therefore, the facilities covered under all state permits issued after that date were limited to less than 40 tpy of VOC and were required to record daily VOC usage. The use of new USEPA approved AP-42 emission factors for the operations associated with the source in calculating the VOC emissions for the source has resulted in a lower calculated potential emissions for the entire source. The results of the latest calculations indicate that the source's potential emissions never exceeded the PSD major source threshold of 250 tpy of any criteria pollutants. Therefore the source is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

This rule applies to the following emission units:

Facility	Date Permitted	PTE Single HAP	PTE Total HAPs	Reason 326 IAC 2-4.1-1 is not applicable
Banbury Mills and Mixers	N/A	0.00	1.98	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Barwell Extruder	N/A	0.00	0.03	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 1 Extruders	SSM169-11387-00004, issued on March 13, 2000	0.00	4.41	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 2 Extruders	N/A	0.00	4.41	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 3 Extruders	169-11083-00004, issued on December 3, 1999	0.00	4.41	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 5 Extruders	N/A	0.00	4.41	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 6 Extruders	N/A	0.00	4.41	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Department 350 RCT brush application	N/A	0.53 (toluene)	3.81	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 1 On-Line topcoat spray booth	N/A	15.74 (toluene)	21.03	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 2 On-Line HVLP spray booth	N/A	15.74 (toluene)	21.03	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 3 topcoat spray booth	SSM169-11387-00004, issued on March 13, 2000	0.98 (glycol ethers)	0.98	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Finishing Area 239 HVLP coating operation	N/A	16.05 (xylene)	19.90	The emission units were constructed prior to the applicability date of July 27, 1997.
U152 (below belt) Coating Booth	169-12230-00004, issued on June 23, 2000	9.89 (toluene)	11.83	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 1 adhesive application booth	SSM169-11387-00004, issued on March 13, 2000	12.42 (xylene)	23.35	The emission units were constructed prior to the applicability date of July 27, 1997.
Line 2 adhesive application booth	N/A	1.64 (xylene)	3.08	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 3 adhesive application booth	N/A	1.09 (xylene)	2.06	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 5 adhesive application booth	N/A	1.64 (xylene)	3.08	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 7 adhesive application booth	CP169-9774-00004, issued on August 18, 1998	3.28 (xylene)	6.17	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively

Facility	Date Permitted	PTE Single HAP	PTE Total HAPs	Reason 326 IAC 2-4.1-1 is not applicable
Line 8 adhesive application booth	N/A	3.28 (xylene)	6.17	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively
Line 9 adhesive application booth	N/A	3.28 (xylene)	6.17	The PTE of any single and total HAPs are less than less than 10 and 25 tons per year, respectively

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the rubber product manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The allowable emissions for each facility are as follows:

Emission Unit	Process Weight Rate (tons/hr)	Uncontrolled PM Emissions (lb/hr)	Control Efficiency %	Controlled PM Emissions (lb/hr)	Allowable PM Emissions (326 IAC 6-3-2) (lb/hr)
Banbury Mills	5.55	10.27	99.00%	0.10	12.93
Compound Handling	15.00	18.36	99.00%	0.18	25.16

(b) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Line 1 On-Line topcoat spray booth, Line 2 On-Line HVLP spray booth, Line 3 topcoat spray booth, Finishing Area 239 HVLP coating operation and the U152 (below belt) Coating Booth shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

(c) Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Grinding and machining operation, Trimmers, Maintenance Wood Shop, Maintenance metal and mill wright shop, P207 Finishing area, Maintenance area 220 enclosed abrasive blast, Area 207 Littleford day mixer, two (2) Barwell Extruders and the one (1) Plug Press and RCT application shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

326 IAC 8-1-6 (General VOC Reduction Requirements)

This rule applies to the following emission units:

Facility	Date Permitted	PTE of VOC	Reason 326 IAC 8-1-6 is not applicable
Banbury Mills and Mixers	N/A	0.52	The PTE of VOC is less than 25 tons per year
Line 1 Extruders	SSM169-11387-00004, issued on March 13, 2000	3.63	The PTE of VOC is less than 25 tons per year
Line 3 Extruders	169-11083-00004, issued on December 3, 1999	3.63	The PTE of VOC is less than 25 tons per year
Line 5 Extruders	N/A	3.63	The PTE of VOC is less than 25 tons per year
Line 6 Extruders	N/A	3.63	The PTE of VOC is less than 25 tons per year
Department 350 RCT brush application	N/A	4.16	The PTE of VOC is less than 25 tons per year
Line 1 On-Line topcoat spray booth	N/A	24.00	The PTE of VOC is limited to less than 25 tons per year
Line 2 On-Line HVLP spray booth	N/A	24.00	The PTE of VOC is limited to less than 25 tons per year
Line 3 topcoat spray booth	SSM169-11387-00004, issued on March 13, 2000	0.93	The PTE of VOC is less than 25 tons per year
U152 (below belt) Coating Booth	169-12230-00004, issued on June 23, 2000	12.68	The PTE of VOC is less than 25 tons per year
Line 1 adhesive application booth	SSM169-11387-00004, issued on March 13, 2000	24.00	The PTE of VOC is limited to less than 25 tons per year
Line 2 adhesive application booth	N/A	3.17	The PTE of VOC is less than 25 tons per year
Line 3 adhesive application booth	N/A	2.11	The PTE of VOC is less than 25 tons per year
Line 7 adhesive application booth	CP169-9774-00004, issued on August 18, 1998	6.34	The PTE of VOC is less than 25 tons per year
Line 8 adhesive application booth	N/A	6.34	The PTE of VOC is less than 25 tons per year
Line 9 adhesive application booth	N/A	6.34	The PTE of VOC is less than 25 tons per year

(a) Pursuant to 169-1993-00004, issued on September 6, 1991, the BACT for the Line Extruders 2 is considered to be no specific VOC control device.

(b) Pursuant to CP169-4072-00004, issued on February 13, 1995, and 326 IAC 8-1-6, the Line 5 adhesive application booth, HVLP coating operations (Finishing Area 239 HVLP coating operation and insignificant P207 topcoat booths) and wipe /cleaning (Finishing Area 239) shall use Best Available Control Technology (BACT). The BACT determined which shall be used at this faculty is:

(1) Drip and wipe method for extruded rubber flocking;
(2) Wipe method for extruded rubber wipe/cleaning; and
(3) HVLP application method for spray coating of primer and decorative topcoat.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source began operation prior to October 7, 1974; therefore, this rule does not apply.

Testing Requirements

There are no new units in operation at the source requiring initial stack testing. Any single facility or control device at the source which hasn't been tested in the past 5 years does not account for greater than 40% of the potential to emit before controls for any pollutant.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The Banbury Mills and Compound handling operations have applicable compliance monitoring conditions as specified below:

(1) The baghouses (CE02, CE03, CE04, CE05, CE06, CE07, CE08, CE09, CE10); used in conjunction with the Banbury Mills and Compound handling for PM control shall be in operation at all times when the Banbury Mills and Compound handling are in operation.

(2) Visible emission notations of the Banbury Mills, stacks (R-23, R-24, R-25, R-26, R-34 and R-38) and Compound handling, stacks (R-15, R-36, R-37 and R-40) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(3) The Permittee shall record the total static pressure drop across baghouses (CE02, CE03, CE04, CE05, CE06, CE07, CE08, CE09, CE10); used in conjunction with the Banbury Mills and Compound handling at least once weekly when the Banbury Mills and Compound handling are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses (CE02, CE03, CE04, CE05, CE06, CE07, CE08, CE09, CE10 shall be maintained within the range of 5 and 15 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

(4) An inspection shall be performed each calender quarter of all bags (identified as CE02, CE03, CE04, CE05, CE06, CE07, CE08, CE09, CE10) controlling the Banbury Mills and Compound handling operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(5) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.

These monitoring conditions are necessary because the baghouses for the Banbury Mills and Compound handling must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

(b) The surface coating operations at the source (which include: Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, Extrusion Line 2 HVLP spray booths, one (1) Line 3 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152) have applicable compliance monitoring conditions as specified below:

(1) The dry filters for PM control for the above mentioned surface coating operations shall be in operation at all times that the above mentioned surface coating operations are in operation.

(2) Visible emission notations of the above mentioned surface coating operations stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(3) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the Line 1 On-Line topcoat spray booth, the Finishing Area 239 HVLP coating operation, the Extrusion Line 2 HVLP spray booths, one (1) Line 3 topcoat spray booth, and one (1) below belt spray coating booth, identified as U152 stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the above mentioned surface coating operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this rubber product manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T169-5650-00004.**

Appendix A: Emission Calculations

Company Name: Gencorp, Inc.
Address City IN: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Combustion	Banbury Mills	Compound Handling	Barwell Ext.	Ext. Line 1	Ext. Line 2	Ext. Line 3	Ext. Line 5	Ext. Line 6	Dept. 350 RCT Brush	Line 1 On-Line Topcoat Booth	Line 2 On-Line HVLP Booth	Line 3 Topcoat Spray Booth	Finishing Area 239	U152 Coating Booth	Line 1 Adhesive Application	Line 2 Adhesive Application	Line 3 Adhesive Application	Line 5 Adhesive Application	Line 7 Adhesive Application	Line 8 Adhesive Application	Line 9 Adhesive Application	TOTAL
PM	0.16	7.88	80.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	0.54	0.93	0.17	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	91.52
PM10	0.65	7.88	80.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	0.54	0.93	0.17	0.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	92.01
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.66
VOC	0.47	0.52	0.00	0.00	3.63	3.63	3.63	3.63	3.63	4.16	24.00	24.00	0.93	19.23	12.68	24.00	3.17	2.11	3.17	6.34	6.34	6.34	155.61
CO	7.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.18
total HAPs	0.15	1.98	0.00	0.03	4.41	4.41	4.41	4.41	4.41	3.81	21.03	21.03	0.98	19.90	11.83	23.35	3.08	2.06	3.08	6.17	6.17	6.17	152.85
worst case single HAP	(hexane) 0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(toluene) 0.53	(toluene) 15.74	(toluene) 15.74	(glycol ethers) 0.98	(xylene) 16.05	(toluene) 9.89	(xylene) 12.42	(xylene) 1.64	(xylene) 1.09	(xylene) 1.64	(xylene) 3.28	(xylene) 3.28	(xylene) 3.28	(xylene) 52.36

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

Emissions Generating Activity

Pollutant	Combustion	Banbury Mills	Compound Handling	Barwell Ext.	Ext. Line 1	Ext. Line 2	Ext. Line 3	Ext. Line 5	Ext. Line 6	Dept. 350 RCT Brush	Line 1 On-Line Topcoat Booth	Line 2 On-Line HVLP Booth	Line 3 Topcoat Spray Booth	Finishing Area 239	U152 Coating Booth	Line 1 Adhesive Application	Line 2 Adhesive Application	Line 3 Adhesive Application	Line 5 Adhesive Application	Line 7 Adhesive Application	Line 8 Adhesive Application	Line 9 Adhesive Application	TOTAL
PM	0.16	0.08	1.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	0.54	0.93	0.02	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.63
PM10	0.65	0.08	1.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.54	0.54	0.93	0.02	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.12
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	8.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	8.66
VOC	0.47	0.52	0.00	0.00	3.63	3.63	3.63	3.63	3.63	4.16	24.00	24.00	0.93	19.23	12.68	24.00	3.17	2.11	3.17	6.34	6.34	6.34	155.61
CO	7.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	7.18
total HAPs	0.15	1.98	0.00	0.03	4.41	4.41	4.41	4.41	4.41	3.81	21.03	21.03	0.98	19.90	11.83	23.35	3.08	2.06	3.08	6.17	6.17	6.17	152.85
worst case single HAP	(hexane) 0.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	(toluene) 0.53	(toluene) 15.74	(toluene) 15.74	(glycol ethers) 0.98	(xylene) 16.05	(toluene) 9.89	(xylene) 12.42	(xylene) 1.64	(xylene) 1.09	(xylene) 1.64	(xylene) 3.28	(xylene) 3.28	(xylene) 3.28	(xylene) 52.36

Total emissions based on rated capacity at 8,760 hours/year.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 1- On Line Topcoat Booth 1																
HS-33-EX-1	7.8	73.56%	0.0%	73.6%	0.0%	21.35%	0.00150	1000.000	5.76	5.76	8.64	207.35	37.84	3.40	26.98	75%
State Potential Emissions			**Add worst case coating to all solvents**								**8.64**	**207.35**	**37.84**	**3.40**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	36.58%	0.00%	75.00%	**5.48**	**131.51**	**24.00**	**0.54**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 2- HVLP On Line Booth 1																
HS-33-EX-1	7.8	73.56%	0.0%	73.6%	0.0%	21.35%	0.00150	1000.000	5.76	5.76	8.64	207.35	37.84	3.40	26.98	75%
Line 2- HVLP On Line Booth 2																
HS-33-EX-1	7.8	73.56%	0.0%	73.6%	0.0%	21.35%	0.00150	1000.000	5.76	5.76	8.64	207.35	37.84	3.40	26.98	75%
State Potential Emissions			**Add worst case coating to all solvents**								**17.28**	**414.70**	**75.68**	**6.80**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	68.29%	0.00%	75.00%	**5.48**	**131.51**	**24.00**	**0.54**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Topcoat Spray Booth																
Coating 8370A/8370C	8.9	4.75%	0.0%	4.8%	0.0%	45.40%	0.50000	1.000	0.42	0.42	0.21	5.08	0.93	4.65	0.93	75%
State Potential Emissions			**Add worst case coating to all solvents**								**0.21**	**5.08**	**0.93**	**4.65**		

Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	80.00%	**0.21**	**5.08**	**0.93**	**0.93**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Finishing Area 239 Booth																
Chemlok 459X	7.2	96.50%	0.0%	96.5%	0.0%	3.00%	0.00029	2100.000	6.95	6.95	4.25	101.90	18.60	0.17	231.60	75%
Xylene	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.00001	2100.000	7.20	7.20	0.14	3.45	0.63	0.00	ERR	75%
State Potential Emissions			**Add worst case coating to all solvents**								**4.39**	**105.36**	**19.23**	**0.17**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	90.00%	**4.39**	**105.36**	**19.23**	**0.02**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
U152 Below Belt Coating Booth																
Urethane Coating	7.6	78.00%	0.0%	78.0%	0.0%	17.85%	0.00230	212.000	5.94	5.94	2.89	69.46	12.68	0.89	33.25	75%
State Potential Emissions			**Add worst case coating to all solvents**								**2.89**	**69.46**	**12.68**	**0.89**		

Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	80.00%	**2.89**	**69.46**	**12.68**	**0.18**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 1 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00150	1000.000	4.00	4.00	6.01	144.15	26.31	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**6.01**	**144.15**	**26.31**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	8.77%	0.00%	0.00%	**5.48**	**131.51**	**24.00**	**0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 2 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00018	1000.000	4.00	4.00	0.72	17.36	3.17	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**0.72**	**17.36**	**3.17**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**0.72**	**17.36**	**3.17**	**0.00**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 3 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00012	1000.000	4.00	4.00	0.48	11.58	2.11	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**0.48**	**11.58**	**2.11**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**0.48**	**11.58**	**2.11**	**0.00**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 5 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00018	1000.000	4.00	4.00	0.72	17.36	3.17	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**0.72**	**17.36**	**3.17**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**0.72**	**17.36**	**3.17**	**0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 7 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00036	1000.000	4.00	4.00	1.45	34.73	6.34	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**1.45**	**34.73**	**6.34**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**1.45**	**34.73**	**6.34**	**0.00**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 8 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00036	1000.000	4.00	4.00	1.45	34.73	6.34	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**1.45**	**34.73**	**6.34**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**1.45**	**34.73**	**6.34**	**0.00**

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Line 9 - Adhesive Application Booth																
Flock Adhesive	8.3	48.30%	0.0%	48.3%	0.0%	45.40%	0.00036	1000.000	4.00	4.00	1.45	34.73	6.34	0.00	8.82	100%
State Potential Emissions			**Add worst case coating to all solvents**								**1.45**	**34.73**	**6.34**	**0.00**		

Limit Usage: PM	Limit Usage: VOC	Control Efficiency: VOC	Control Efficiency: PM	Limit Usage: VOC lbs per Hour	Limit Usage: VOC lbs per Day	Limit Usage: VOC tons per Year	Limit Usage: PM
0.00%	0.00%	0.00%	0.00%	**1.45**	**34.73**	**6.34**	**0.00**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Gencorp, Inc.
Address City: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 1- On Line Topcoat Booth 1																							
HS-33-EX-1	7.8	0.00150	1000.000	12.55%	48.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.66%	0.00%	6.46	24.82	0.00	0.00	0.00	0.00	0.00	0.00	1.88	0.00
														6.46	**24.82**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.88**	**0.00**

Total State Potential Emissions

Limit Usage: VOC		Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
36.58%		**4.09**	**15.74**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.19**	**0.00**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 2- HVLP On Line Booth 1																							
HS-33-EX-1	7.8	0.00150	1000.000	12.55%	48.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.66%	0.00%	6.46	24.82	0.00	0.00	0.00	0.00	0.00	0.00	1.88	0.00
Line 2- HVLP On Line Booth 2																							
HS-33-EX-1	7.8	0.00150	1000.000	12.55%	48.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.66%	0.00%	6.46	24.82	0.00	0.00	0.00	0.00	0.00	0.00	1.88	0.00
														12.91	**49.64**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.77**	**0.00**

Total State Potential Emissions

Limit Usage: VOC		Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
68.29%		**4.09**	**15.74**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.19**	**0.00**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Topcoat Spray Booth for Line #3																							
Coating 8370A/8370C	8.9	0.50000	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.98	0.00	0.00	0.00	0.00
														0.00	**0.00**	**0.00**	**0.00**	**0.00**	**0.98**	**0.00**	**0.00**	**0.00**	**0.00**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.98**	**0.00**	**0.00**	**0.00**	**0.00**

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Gencorp, Inc.
Address City: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Finishing Area 239 Booth																							
Chemlok 459X	7.2	0.00029	2100.000	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.00%	15.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.85
Xylene	7.2	0.00001	2100.000	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.63	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
														16.05	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.85**

Total State Potential Emissions

Limit Usage: VOC		Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%		**16.05**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**3.85**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
U152 Below Belt Coating Booth																							
Urethane Coating	7.6	0.002300	212.00	9.22%	60.85%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.69%	0.00%	1.50	9.89	0.00	0.00	0.00	0.00	0.00	0.00	0.44	0.00
														1.50	**9.89**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.44**	**0.00**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**1.50**	**9.89**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.44**	**0.00**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 1 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00150	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	13.62	0.00	0.00	0.00	0.00	0.00	0.00	1.09	5.45	5.45
														13.62	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.09**	**5.45**	**5.45**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
8.77%	**0.00**	**12.42**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.99**	**4.97**	**4.97**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Gencorp, Inc.
Address City: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 2 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00018	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	1.64	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.66	0.66
														1.64	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.13**	**0.66**	**0.66**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**1.64**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.13**	**0.66**	**0.66**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 3 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00012	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	1.09	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.44	0.44
														1.09	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.09**	**0.44**	**0.44**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**1.09**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.09**	**0.44**	**0.44**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 5 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00018	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	1.64	0.00	0.00	0.00	0.00	0.00	0.00	0.13	0.66	0.66
														1.64	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.13**	**0.66**	**0.66**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**1.64**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.13**	**0.66**	**0.66**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Gencorp, Inc.
Address City: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 7 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00036	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	3.28	0.00	0.00	0.00	0.00	0.00	0.00	0.26	1.31	1.31
														3.28	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**3.28**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 8 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00036	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	3.28	0.00	0.00	0.00	0.00	0.00	0.00	0.26	1.31	1.31
														3.28	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**3.28**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Weight % 4,4' - Diphenylmethane diisocyanate	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
Line 9 - Adhesive Application Booth																							
Flock Adhesive	8.3	0.00036	1000.000	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.00%	10.00%	10.00%	3.28	0.00	0.00	0.00	0.00	0.00	0.00	0.26	1.31	1.31
														3.28	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

Total State Potential Emissions

Limit Usage: VOC	Limit Usage: PM	Limit Usage: Xylene Emissions (ton/yr)	Limit Usage: Toluene Emissions (ton/yr)	Limit Usage: Formaldehyde Emissions (ton/yr)	Limit Usage: Benzene Emissions (ton/yr)	Limit Usage: Hexane Emissions (ton/yr)	Limit Usage: Glycol Ethers Emissions (ton/yr)	Limit Usage: Methanol Emissions (ton/yr)	Limit Usage: 4,4' - Diphenylmethane diisocyanate Emissions (ton/yr)	Limit Usage: Methyl Isobutyl Ketone Emissions (ton/yr)	Limit Usage: Ethyl Benzene Emissions (ton/yr)
0.00%	**0.00**	**3.28**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.26**	**1.31**	**1.31**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Process Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Emission Unit	Pollutant	Maximum Rate (lbs/hr)	Emission Factor (lb/lb processed)	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions (tons/yr)	Control Efficiency (%)	Maximum Controlled Emissions (tons/yr)
Banbury Mills Banbury #2	PM	2700	2.22000E-04	0.5994	2.63	99.00%	0.03
	VOC	2700	1.47000E-05	0.0397	0.17	0.00%	0.17
	HAPs	2700	5.58000E-05	0.1507	0.66	0.00%	0.66
Banbury Mills Banbury #3	PM	2700	2.22000E-04	0.5994	2.63	99.00%	0.03
	VOC	2700	1.47000E-05	0.0397	0.17	0.00%	0.17
	HAPs	2700	5.58000E-05	0.1507	0.66	0.00%	0.66
Banbury Mills Banbury #4	PM	2700	2.22000E-04	0.5994	2.63	99.00%	0.03
	VOC	2700	1.47000E-05	0.0397	0.17	0.00%	0.17
	HAPs	2700	5.58000E-05	0.1507	0.66	0.00%	0.66
Compound Handling Carbon Black Unloading	PM	15	0.58000	8.7000	38.11	99.00%	0.38
Compound Handling Carbon Black Conveying	PM	15	0.58000	8.7000	38.11	98.00%	0.76
Compound Handling Weigh Stations	PM	1.6	0.60000	0.9600	4.20	99.00%	0.04
Barwell Ext.- Barwell Extruder	PM	200	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	200	3.52000E-06	0.0007	0.00	0.00%	0.00
	HAPs	200	2.99000E-05	0.0060	0.03	0.00%	0.03

Notes:

Emission Factors from the Draft AP-42 Section 4.12

Appendix A: Emissions Calculations
Process Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Emission Unit	Pollutant	Maximum Rate	Emission Factor	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions	Control Efficiency	Maximum Controlled Emissions
Ext. Line 1- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.52000E-06	0.0035	0.02	0.00%	0.02
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13
Ext. Line 1- Curing	VOC	1000	8.25000E-04	0.8250	3.61	0.00%	3.61
	HAPs	1000	9.76000E-04	0.9760	4.27	0.00%	4.27
Ext. Line 2- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.52000E-06	0.0035	0.02	0.00%	0.02
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13
Ext. Line 2 - Curing	VOC	1000	8.25000E-04	0.8250	3.61	0.00%	3.61
	HAPs	1000	9.76000E-04	0.9760	4.27	0.00%	4.27
Ext. Line 3- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.52000E-06	0.0035	0.02	0.00%	0.02
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13
Ext. Line 3- Curing	VOC	1000	8.25000E-04	0.8250	3.61	0.00%	3.61
	HAPs	1000	9.76000E-04	0.9760	4.27	0.00%	4.27

Notes:

Emission Factors from the Draft AP-42 Section 4.12

Appendix A: Emissions Calculations
Process Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Emission Unit	Pollutant	Maximum Rate	Emission Factor	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions	Control Efficiency	Maximum Controlled Emissions
Ext. Line 5- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.52000E-06	0.0035	0.02	0.00%	0.02
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13
Ext. Line 5- Curing	VOC	1000	8.25000E-04	0.8250	3.61	0.00%	3.61
	HAPs	1000	9.76000E-04	0.9760	4.27	0.00%	4.27
Ext. Line 6- Extruder	PM	1000	2.67000E-08	0.0000	0.00	0.00%	0.00
	VOC	1000	3.52000E-06	0.0035	0.02	0.00%	0.02
	HAPs	1000	2.99000E-05	0.0299	0.13	0.00%	0.13

Notes:

Emission Factors from the Draft AP-42 Section 4.12

Appendix A: Emissions Calculations
Process Operations

Company Name: Gencorp, Inc.
Address City IN Zip: One General Street, Wabash, IN 46992
Title V: T169-5650-00004
Reviewer: PR/EVP
Date: April 1, 1996

Emission Unit	Pollutant	Maximum Rate	Emission Factor	Emission Rate (lb/hr)	Maximum Uncontrolled Emissions	Control Efficiency	Maximum Controlled Emissions
Ext. Line 6- Salt Cure	NOx	1000	0.00003	0.0263	0.12	0.00%	0.12
	VOC	1000	0.00083	0.8250	3.61	0.00%	3.61
	HAPs	1000	0.00098	0.9760	4.27	0.00%	4.27
Banbury Mills1- Barwell Plug Press	VOC	100	0.00570	0.5700	2.50	0.00%	2.50
	HAPs	100	0.00510	0.5100	2.23	0.00%	2.23
Banbury Mills1- RCT-9217	VOC	100	0.00380	0.3800	1.66	0.00%	1.66
	Toluene	100	0.00120	0.1200	0.53	0.00%	0.53
	Glycol Monobuty Ether	100	0.00020	0.0200	0.09	0.00%	0.09
	Methanol	100	0.00220	0.2200	0.96	0.00%	0.96

Notes:

Emission Factors from the Draft AP-42 Section 4.12

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Combustion Units

Company Name: **Gencorp, Inc.**
Address City IN Zip: **One General Street, Wabash, IN 46992**
Title V: **T169-5650-00004**
Reviewer: **PR/EVP**
Date: **April 1, 1996**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
19.5	170.9

36 0.12 mmBtu/hr natural gas units
1 0.75 mmBtu/hr natural gas units
12 0.9375 mmBtu/hr natural gas units
2 1.25 mmBtu/hr natural gas units
1 0.687 mmBtu/hr natural gas units

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.16	0.65	0.05	8.54	0.47	7.18

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Company Name: **Gencorp, Inc.**
Address City IN Zip: **One General Street, Wabash, IN 46992**
Title V: **T169-5650-00004**
Reviewer: **PR/EVP**
Date: **April 1, 1996**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.01	0.15	0.00

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.